

EXHIBIT 3

001284

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT

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In Re

JAMIE LYNN GALLIAN,

Debtor

**HOUSER BROS. CO. Dba RANCHO DEL
REY MOBILE HOME ESTATES,**

Plaintiff,

CERTIFIED COPY

vs.

No. 8:21-bk-11710-ES

JAMIE LYNN GALLIAN,

Defendants.

_____ /

REMOTE CONFERENCING DEPOSITION OF JAMIE GALLIAN

Taken before NICOLE HATLER

CSR No. 13730

June 28, 2022

JOB No. 22-112744

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1 **REMOTE CONFERENCING DEPOSITION OF JAMIE GALLIAN**

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4 **BE IT REMEMBERED**, that pursuant to Notice, and on
5 the 28th day of June 2022, commencing at the hour of 8:11
6 a.m., in the respective locations via Zoom, before me,
7 **NICOLE HATLER**, a Certified Shorthand Reporter, State of
8 California, personally appeared **JAMIE GALLIAN**, produced
9 as a witness in said action, and being by me first duly
10 sworn, was thereupon examined as a witness in said cause.

11 **---oOo---**

12 **APPEARANCES ALL REMOTELY VIA ZOOM**

13 **For the Plaintiff:**

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JAMIE GALLIAN

sworn as a witness

testified as follows:

THE REPORTER: Good morning. My name is Nicole Hatler, California Certified Shorthand Reporter No. 13730. This deposition will be stenographically reported pursuant to CCP 2025.

Counsel, you may proceed.

MR. HAYS: Thank you.

EXAMINATION BY MR. HAYS:

Q. Good morning, Ms. Gallian. We've met several times before, but for the record, my name is Ed Hays, and I am the attorney for the plaintiff and creditor in your bankruptcy proceeding, which is Houser Bros.

Ms. Gallian, have you ever been deposed before?

A. Yes.

Q. And can you estimate for me how many times you've been deposed?

A. I think once.

Q. And --

A. I believe it was once.

Q. And how long ago was that?

A. I believe it was -- I believe it was at the beginning of 2020.

Q. And in what matter was that in connection with?

1 A. Gables Huntington Beach.

2 Q. And that was litigation between you and Gables
3 Huntington Beach?

4 A. Yes, the homeowners' association.

5 Q. Yes. And that's been a couple of years, so let
6 me just give you a couple of reminders. And the court
7 reporter also gave us a couple of reminders.

8 Please do not start talking or answering my
9 question until I'm done so that we're not talking at the
10 same time, which makes her job a whole lot easier, and
11 also makes for a cleaner record so the entire question is
12 there and then your answer will be there. I will do my
13 best not to start asking you the next question until
14 you're done answering the first question.

15 This is also a deposition of you. So I'm the
16 person who gets to ask the questions today, and so, I
17 would ask you to refrain from asking me any questions
18 other than, perhaps, a question to clarify what I am
19 asking you.

20 The -- is there any reason why the examination
21 cannot proceed this morning?

22 (Technical interruption.)

23 (A recess was held from 8:13 a.m. until 8:18 a.m.)

24 THE WITNESS: No, not at this time.

25 //

1 BY MR. HAYS:

2 Q. And let me -- I think that the next question had
3 been, Ms. Gallian, what was the highest level of
4 education that you had completed?

5 A. High school, some college, no degree.

6 Q. No degree. Thank you.

7 And Ms. Gallian, are you currently employed?

8 A. Yes.

9 Q. And what is your job?

10 A. Assistant manager for Walgreens pharmacy.

11 Q. And how long have you worked for Walgreens?

12 A. Since the end of March 2022.

13 Q. And when were you last employed prior to this
14 job with Walgreens?

15 A. I worked for, I believe, two or three days for
16 Albertsons, but the injury hadn't healed yet, so I was
17 not able to continue.

18 Prior to that, my normal career as a flight
19 attendant October 2018.

20 Q. Is when you last worked --

21 A. Yes.

22 Q. -- as a flight attendant, correct?

23 A. Yes.

24 Q. Okay. Speaking of October 2018, at that time,
25 were you the owner of a property located at 4476

1 Alderport Unit 53 in Huntington Beach?

2 A. Potentially.

3 Q. And can you explain why you used the word
4 potentially?

5 A. I discovered that when Sandra Bradley in 2010
6 filed a document in the recorder's office, she was trying
7 to -- she was trying to -- you're probably better than
8 this than I am, but she was trying to put the home, which
9 she had purchased November 23rd, 2009, into the name of
10 her trust. However, it never made it into the name of
11 her trust. Instead, it made it into Houser Bros. name as
12 a grant deed.

13 Q. When did you first start occupying the Alderport
14 property?

15 A. On the -- tenancy -- my tenancy began for
16 Ms. Bradley on November 23rd, 2009.

17 Q. And when you say tenancy, is that because you
18 were renting as opposed to owning?

19 A. That's correct.

20 Q. At some point, did you purchase the property?

21 A. No, I did not.

22 Q. Were you ever the owner of the property?

23 A. I was assigned an assignment of something. I'm
24 not sure if it was the unit or if it was the ground
25 lease.

1 Q. What did you pay in exchange for receiving that
2 assignment?

3 A. I didn't pay anything. It was a part of my
4 inheritance is what I was told.

5 Q. And was Ms. Bradley related to you?

6 A. She was my father's wife.

7 Q. And when you say part of your inheritance, does
8 that mean that, after Ms. Bradley passed away, you
9 received this assignment?

10 A. No.

11 Q. What triggered your inheritance which included
12 receiving this assignment?

13 A. Ms. Bradley is still alive.

14 Q. That wasn't my question.

15 My question is, you said you were told this is
16 part of an inheritance, and I'm asking what triggered
17 your right to inherit.

18 A. She called me up and said, I'm gifting you the
19 property. Go down to the trust office and sign the
20 documents.

21 Q. And when you said that she was your father's
22 wife, is that your biological father?

23 A. Yes, it is. To the best of my knowledge, yes,
24 it is.

25 Q. And what is his name?

1 A. Charles Bradley, Jr.

2 Q. So when Ms. Bradley gifted you the property,
3 what document did you receive?

4 Was it a grant deed or something else?

5 A. It was an assignment -- that's all that it said.
6 It was an assignment.

7 Q. That was the title of the document?

8 A. That was the title of it.

9 Q. And was the assignment recorded with the county
10 recorder?

11 A. Yes.

12 Q. And do you know when that was recorded?

13 A. March 23rd, I believe.

14 Q. Of which year?

15 A. 2017.

16 Q. Is that what time the gift was made to you?

17 A. Yes.

18 Q. In March of 2017?

19 A. Yes.

20 Q. So just to make sure I'm understanding, you
21 first --

22 A. I --

23 Q. -- you first started living there in November of
24 2009 as a tenant, and you then became the owner by
25 receipt of a gift in March of 2017?

1 A. That's correct.

2 Q. The assignment that was recorded in your favor,
3 was your individual name listed as the assignee?

4 A. I believe it was. I was looking to see if I had
5 it readily available, but I don't.

6 Q. At some point, did you sell the Alderport
7 property?

8 A. Yes.

9 Q. And when was that?

10 A. October 31st, 2018. October 31st.

11 Q. Yes, I heard, Halloween.

12 So who was the buyer from you at that time?

13 A. Randall Nickel.

14 Q. And how did you come about selling the property?

15 Did you retain a broker and put it on the
16 Multiple Listing Service, or was there some other process
17 you used?

18 A. Originally, it was listed on the MLS. That
19 contract was canceled. Then I listed it for sale by
20 owner on multiple listing sites as, like, Zillow for
21 example, Zillow or Trulia or those types of internet.

22 Q. And so, the buyer that was found, Mr. Nickel,
23 was somebody that responded to some of your for sale by
24 owner advertisements?

25 A. His wife responded.

1 Q. And had you ever met or heard of Mr. Nickel
2 before that response?

3 A. No. His wife -- his wife originally contacted
4 me through Zillow.

5 Q. And you never heard of him or his wife?

6 A. No.

7 Q. Prior to that initial contact, correct?

8 A. That's correct.

9 Q. Okay. And what was the sale price?

10 A. \$379,000.

11 Q. And what was the price at which the property had
12 been listed when you were represented by a broker?

13 A. I believe the property -- this was several years
14 ago, but I believe the property when the broker was --
15 listed for 461 or 441. It was -- it was higher than what
16 I ended up selling it at.

17 Q. Understood.

18 Was there a traditional escrow that was opened
19 and used in connection with the sale of the property?

20 A. No.

21 Q. And how was the sale of the property handled in
22 the absence of an escrow?

23 A. Well, let me -- let me with rephrase.

24 I was working as a referral from Old Republic
25 to -- I'm trying to think what that company's name was.

1 I remember the person that was working with me was
2 Cheryl, but I can't remember right this second what the
3 name of the escrow company was. So I was working with an
4 escrow company for several months.

5 Q. In connection with the actual sale?

6 A. There -- Mr. Nickel was the third buyer. So
7 there was -- there was potential -- previous buyers that
8 were -- that were canceled, fell through, whatever.

9 Q. Let me -- let me try to clarify.

10 In connection with the sale to Mr. Nickel, was
11 there an escrow that was handling receipt of documents
12 and money and doing the recordings and all of the
13 traditional functions of an escrow?

14 A. No.

15 Q. And so, then the question I had for you was in
16 the absence of that escrow, in connection with your
17 actual sale to Mr. Nickel, how were the documents and
18 money handled?

19 A. It's a title. So the -- and I owned it
20 unencumbered. I provided a preliminary title report from
21 the Old Republic title company, offered title insurance
22 and had notebooks full of all the governing documents and
23 e-mails of receipt that I had sent a demand. I just --
24 basically, it was a -- an assignment.

25 Q. So let me see if I can try to summarize and make

1 sure I understand.

2 The document that you signed to transfer title
3 to Mr. Nickel, was that done at the same time that
4 Mr. Nickel handed you the money?

5 A. That's correct.

6 Q. So if this were a used car as opposed to a
7 mobile home, it would have been handled in a similar
8 fashion to --

9 A. There --

10 (Multiple speakers simultaneously.)

11 THE REPORTER: I'm sorry. I couldn't --

12 THE WITNESS: I interrupted -- I -- go ahead.

13 Go ahead, Mr. Hays.

14 BY MR. HAYS:

15 Q. Would have been handled in a similar fashion to
16 the sale of a used car, correct?

17 A. The chattel, yes.

18 Q. And when you're saying chattel, you're referring
19 to the mobile home, correct?

20 A. No.

21 Q. What are you referring to?

22 A. The assignment on the -- you're asking about the
23 Alderport address.

24 Q. Oh, I'm sorry. You are correct. The -- the
25 real property.

1 So in what form did Mr. Nickel pay the \$379,000?

2 A. Cashiers.

3 Q. Cashier's check.

4 And was the cashier's check made payable to you
5 individually?

6 A. Yes.

7 Q. And what did you do with the cashier's check?

8 A. Deposited them, both checks, into the Santa Ana
9 branch of Chase Bank.

10 Q. And you said both checks.

11 There were two cashier's checks?

12 A. That's correct.

13 Q. And you deposited them at the Santa Ana branch
14 of Chase Bank into accounts in the name of whom?

15 A. Jamie Gallian.

16 Q. At or about the same time, did you purchase the
17 mobile home located at 16222 Monterey Lane, space 376, in
18 Huntington Beach?

19 A. Yes.

20 Q. And what was the date of your purchase of the
21 mobile home?

22 A. I received the -- trying to get the name of the
23 on the back of the document -- I received the
24 surrendered -- I received the surrendered certificate of
25 title November 1st.

1 Q. Of 2000 --

2 A. 2018.

3 Q. And the seller of the mobile home was Ms. Ryan?

4 A. Yes.

5 Q. And what was your purchase price?

6 A. Originally, it was 225, but I ended up paying
7 185.

8 Q. And how is the one -- how are you coming up with
9 185 number?

10 Because I think I've seen 175, 179, some number
11 around that. How is it that you're coming up with 185?

12 A. Because I gave her \$10,000 cash as a deposit.

13 Q. And then you paid an additional 175?

14 A. That's correct.

15 Q. Okay. That explains it.

16 How did you pay her the money?

17 A. In Chase cashier's checks.

18 Q. And so, you went down to the Santa Ana branch of
19 Chase and got cashier's checks out of the account that
20 was in your name that was holding the sales proceeds from
21 Alderport?

22 A. I don't know if it was the Santa Ana branch, but
23 it was a Chase branch.

24 Q. Okay. More important than the particular branch
25 was you took the money out of the account in which you

1 had deposited the sales proceeds of Alderport, correct?

2 A. That's correct.

3 Q. And there were two separate cashier's checks for
4 10,000, and 175,000?

5 A. No. They were \$50,000 checks and a \$20,000
6 check and \$10,000 in cash.

7 Q. So the deposit of 10,000 was cash?

8 A. Yes. That -- that was the deposit.

9 Q. And was the -- when was the deposit paid?

10 Was it before or after you sold Alderport?

11 A. After.

12 Q. So were the proceeds of Alderport constituting
13 the full 185,000 that you paid to Ms. Ryan?

14 A. That's correct.

15 Q. And so, the 185, you said 10,000 was cash, and
16 the balance was a series of cashier's checks totalling
17 175,000?

18 A. I remember -- it's been so long -- I remember
19 there was three \$50,000 checks, and a \$20,000 check,
20 maybe there was a 5,000, but I don't recall. But I do
21 remember the \$10,000 cash and then the other three --
22 four -- I guess it would be four -- three 50,000s and a
23 20 and maybe there was a 5, but I remember it was 175.

24 Q. Okay. If you sold the property at Alderport for
25 379,000 and then you used 185 to purchase the property --

1 the mobile home, that leaves approximately \$194,000 of
2 excess sales proceeds.

3 What happened to that money?

4 A. \$175,000 of it was a loan to J Sandcastle, and
5 the balance was just paid to attorneys.

6 (Reporter clarification.)

7 BY MR. HAYS:

8 Q. And Ms. Gallian, that's J as in Jamie, for
9 example, and is Sandcastle one word or two words?

10 A. One.

11 Q. And that's an LLC?

12 A. That's correct.

13 Q. And you loaned \$175,000 to J Sandcastle, you
14 were just telling us.

15 Do you know when that occurred?

16 A. I signed the loan documents on November 16th,
17 2018, at the courthouse in Santa Ana.

18 Q. And why did J Sandcastle borrow money from you?

19 A. I don't recall at this time. It's been so long.

20 Q. When Ms. Ryan transferred the title to the
21 mobile home --

22 A. She surrendered.

23 Q. Surrendered?

24 A. She surrendered the certificate of title.

25 Q. Surrendered, transferred, I think it means the

1 same thing, but I'll try to use your word. The -- when
2 she surrendered it, which name went on title?

3 Was it your name, individually?

4 A. It was two documents that go into a surrender of
5 a certificate of title. You have to give notice, and my
6 name was on the notice. There's a -- it's a -- it's an
7 HCD document, Housing and Community Development document,
8 and its notice -- I believe the document says -- it's one
9 of your documents here. It says notice or transfer of
10 something, and my name was on the line for the purchaser.

11 Q. Okay. And then you said there were two
12 documents. What's the second document?

13 A. The actual certificate, the original certificate
14 that's surrendered.

15 Q. So procedurally, please explain what happens
16 with the actual certificate.

17 Is there an actual certificate similar to a
18 vehicle's pink slip that the seller signs off and then
19 hands to the buyer, and then the buyer submits that to
20 HCD and then a new certificate gets issued?

21 Is that how that works?

22 A. That's correct. That's the way I have come to
23 find out. Yes.

24 Q. Okay. So when the actual certificate was
25 reissued showing the new registered owner, which name

1 appeared as the new registered owner of the mobile home?

2 Was it you, individually, or was it J
3 Sandcastle?

4 A. No. The -- the notice of transfer was
5 subsequently changed from Jamie Gallian to J Sandcastle.
6 If you'll -- if you'll notice your document -- I was
7 trying to find the document. You'll notice that it's
8 whited out on the document, and on November 15th,
9 Ms. Ryan re-signed it, the notice of transfer, and on
10 the -- the back of your document, you actually have the
11 notarization of her signature on November 15th.

12 Q. Not --

13 A. And the --

14 Q. I'm not sure I heard the answer to the question.
15 When --

16 A. I was -- I was getting to the second sentence.

17 Q. Okay.

18 A. Okay. So then on November 16th, when I drove
19 the actual original certificate, I listed as the
20 registered -- I registered the manufactured home in the
21 name of J Sandcastle on November 16th.

22 Q. And -- and I've been saying mobile home. You
23 just said manufactured home.

24 A. Yes.

25 Q. We're referring to the same thing, right?

1 A. Yes.

2 Q. The property that's located at space 376?

3 A. That's correct.

4 Q. Okay. Is it more correct to say manufactured
5 home over mobile home?

6 A. In California, they kind of use it
7 interchangeably. Manufactured homes is probably more
8 accurate. Mobile home, kind of, means it -- things like,
9 you know, you can park -- you know, back in your
10 grandma's 1962 Chevy and pull it out it. It's -- it
11 doesn't move, doesn't have any wheels on it.

12 Q. I understand.

13 A. Probably manufactured is more accurate.

14 Q. Okay. I will attempt to remember manufactured
15 home.

16 A. Okay.

17 Q. So we speak the same language here.

18 A. Sure.

19 Q. So when the certificate was reissued from
20 Ms. Ryan as owner, HCD reissued it in the name of J
21 Sandcastle, correct?

22 A. As the registered party, yes.

23 Q. Okay. And by registered owner, does that mean
24 similar to a vehicle, who is the owner of the car, as
25 opposed to a lienholder, which would be the legal owner?

1 Are -- did you understand my question?

2 A. Yeah. I'm just re-reading it.

3 Because at the time, I was not familiar with a
4 lot of HCD policies like I am now. So at the time, I
5 didn't consider it a big pink slip, but you're right. It
6 is exactly like a giant pink slip, as a car.

7 So when you -- when you register a home -- the
8 home in the name of one person, if there's no legal
9 owner, they are one and the same.

10 Q. And then the legal owner would be similar to
11 buying a vehicle that a bank or a credit union finances,
12 the legal owner is the party that holds the lien secured
13 by the title, correct?

14 A. That's correct.

15 Q. Okay. So why did you put J Sandcastle down as
16 the registered owner of the manufactured home upon
17 acquisition?

18 A. Okay. Because when Lisa Ryan, on November 1st,
19 gave notice on the transfer document, the Houser attorney
20 filed a writ of execution without notice, without
21 approval from the court, and in the name of Lisa Ryan and
22 executed -- well, let me see -- did she send it to me?
23 How did I get that? I'm trying to think of how I got the
24 writ.

25 Because that was the whole reason why I

1 requested Lisa Ryan to re-sign that notice on
2 November 15th is because of that writ. I didn't -- I was
3 going to back out of the deal. I was not happy that
4 after the certificate of title had been surrendered and
5 the notice was given -- signed on November 1st that I was
6 the purchaser, I was not happy with Houser's attorney
7 interfering with the sale of the home.

8 So I had was at court on November 16th at Santa
9 Ana, and it was a decision. It was -- it was whether I
10 was going to back out of the deal or whether I was going
11 to go through with the deal. And obviously, I went
12 through with the deal. However, I registered the home in
13 the name of J Sandcastle.

14 Q. Let me unpack a little bit of what you just said
15 to make sure that the record is clear. You're saying
16 that the Houser's attorney had filed a writ of execution
17 against Lisa Ryan.

18 Are you saying that the Houser Bros. were in
19 litigation against Lisa Ryan, correct?

20 A. I wasn't aware of that at the time.

21 Q. I'm not asking what you were aware of at the
22 time. I just want to try to explain and make sure that
23 your answer from a minute ago was clear.

24 You were referring to litigation between Houser
25 Bros. and Lisa Ryan, correct?

1 A. I can't state that -- I can't tell you what I'm
2 referring to back when I was became aware of that writ.
3 I didn't even know what a writ was.

4 Q. But -- but my point is the Houser Bros. were not
5 in litigation with you in November of 2018, correct?

6 A. No. I was not a party.

7 Q. Yes. So whatever this litigation was, was not
8 against you, but it was against Lisa Ryan, and the Houser
9 Bros. attorneys did something that you said caused there
10 to be a lien against the title.

11 Is that what you said?

12 A. No. What I said was -- is that I became aware
13 of an execution -- a writ of execution after I purchased
14 the home with the money that I got from the sale of
15 Alderport, and I believe that writ -- the notice was
16 dated November 1st -- the notice of transfer was dated
17 November 1st, and I believe the writ was dated either
18 November 11th or the 14th. I don't remember exactly what
19 date and I became very concerned because the writ was --
20 to my knowledge as I remember it, I believe that the writ
21 was on the space -- not the home, the space, the ground,
22 the -- the real property.

23 Q. So -- so just to make sure I'm following you
24 because it's important that I understand what you're
25 saying.

1 A. Sure.

2 Q. You acquired the property by surrender on
3 November 1st?

4 A. That's correct.

5 Q. But then there was this writ of execution that
6 pops up on November 11th to 14th, somewhere in that time
7 frame?

8 A. That's correct.

9 Q. And that --

10 A. But it was not in my name --

11 (Multiple speakers simultaneously.)

12 THE REPORTER: Hold on. Everybody has to
13 remember one at a time. I can't get you both

14 THE WITNESS: Yep. Sorry.

15 MR. HAYS: And me, as well.

16 BY MR. HAYS:

17 Q. So -- so when you discovered this, you were
18 deciding whether to try to back out of the sale or not,
19 and then you ultimately went forward with the purchase,
20 correct?

21 A. That's correct.

22 Q. Okay. And then you were saying you made a
23 decision at that time to put title -- the registered
24 owner in the name of J Sandcastle.

25 Can you tell us any reasons that you would have

1 done that?

2 A. Because I loaned -- I made the loan on the
3 same -- November 16th. So on November 15th, I met with
4 Lisa Ryan and shared her with my concerns and -- you
5 know, again, not being familiar with the difference
6 between personal property and real property and, you
7 know, I did not consider my manufactured home as a used
8 car, and that's exactly what it is, and I was not
9 familiar with that. I did not believe that when I
10 purchased it.

11 So I was a little leery, and I went ahead and
12 registered it in the name of J Sandcastle. And I also
13 loaned J Sandcastle an amount of money and executed a
14 security agreement and promissory note and secured it
15 with the house.

16 Q. And when you said you loaned an amount of money,
17 was that the \$175,000 that you referenced earlier?

18 A. No. The loan amount is 225.

19 Q. I believe earlier you testified that 175 was a
20 loan to J Sandcastle.

21 Is that the amount of money that went from the
22 account in your name to an account in the name of J
23 Sandcastle?

24 A. Yes. That is correct. That is the cashier's
25 check -- that I drew a cashier's check for 175 from my

1 private account and placed it in the account of J
2 Sandcastle. Yes. You are absolutely correct.

3 Q. And then there was the promissory note, but the
4 promissory note was in the amount of 225,000?

5 A. Yes, in contemplation of future advances or
6 if -- if they needed more money.

7 Q. And then you also said that you signed a
8 security agreement in favor of J Sandcastle?

9 A. That's correct.

10 Q. And what was the collateral in this security
11 agreement?

12 A. The home.

13 Q. What did J Sandcastle give you in exchange for
14 receipt of the money and receipt of your executed
15 promissory note and receipt of the security agreement
16 pledging the property as collateral?

17 A. The promissory note to pay it back.

18 Q. Well, no. You -- you gave -- you gave the cash
19 to J Sandcastle. You signed a promissory note in favor
20 or -- it -- it signed a promissory note in favor of you?

21 A. Correct.

22 Q. Okay. I had it backwards from what you were
23 saying?

24 A. Correct.

25 Q. And then the security agreement was J Sandcastle

1 pledging the home as collateral to secure repayment?

2 A. Correct.

3 Q. All right. When was J Sandcastle formed?

4 A. October 18th, 2018.

5 Q. Was it formed in contemplation of your purchase
6 of the manufactured home?

7 A. No.

8 Q. Why did you form it?

9 A. I liked the name.

10 Q. But why did you form an entity?

11 Why did you form an LLC at that time?

12 A. There isn't a reason. That's the reason. I
13 secured -- or I -- what do you call it -- what do you
14 call that when, you know, you have to search to see if
15 even a name is available?

16 Q. You ran the name search to see if the entity was
17 available --

18 A. Yes.

19 Q. -- is that what you're saying?

20 A. Yes.

21 Q. All right. When did you decide to use the name
22 J Sandcastle as the registered owner if it wasn't formed
23 for that purpose?

24 A. On November 16, 2018.

25 Q. At the time that J Sandcastle was formed, were

1 you 100 the owner and member?

2 A. Yes.

3 Q. Has there ever been a change of ownership from
4 its inception to the present?

5 A. No.

6 Q. You have always been the 100 percent owner?

7 A. Yes.

8 Q. What did J Sandcastle do with the 175,000 of
9 cash that it received from you?

10 A. I don't remember. I don't -- that was almost
11 five years ago.

12 Q. Did anybody, other than yourself, ever have
13 signature writing authority on the J Sandcastle bank
14 account?

15 A. I believe -- and I'm not 100 percent sure, but
16 Bob McLelland has a -- he signed a signatory card, but I
17 was not -- I'm not sure if it's on the J Sandcastle
18 account. It probably is. I'm going to say 90 percent
19 sure that it's Bob McLelland. He's never signed
20 anything, though, but he's on the signature card.

21 Q. Can you spell McLelland for us?

22 A. M-C-L --

23 THE REPORTER: Say that one more time?

24 THE WITNESS: M-C-capital L-L-E -- L-L -- let's
25 see, oh, my God. M-C-L-E-L-L-A-N-D, I believe.

1 BY MR. HAYS:

2 Q. And then who is Mr. McLelland?

3 A. He's just a friend that I've known since
4 probably 2010.

5 Q. And why was he on the signature card for J
6 Sandcastle?

7 A. Emergency reasons.

8 Q. To the best of your knowledge, he never signed
9 anything to withdraw, transfer, or pay money out of the J
10 Sandcastle account?

11 A. No, he did not.

12 Q. Okay. How much money is currently on deposit in
13 the J Sandcastle accounts?

14 A. I don't think anything.

15 Q. How much money was in the J Sandcastle accounts
16 when you filed your bankruptcy petition in July of 2021?

17 A. I believe it was -- well, maybe a little bit
18 more than \$9,000. It might have been a little bit more,
19 little bit less, but it was around 9.

20 Q. Has J Sandcastle ever filed its own tax returns?

21 A. No.

22 Q. And --

23 A. Hasn't done any business.

24 Q. Is it a passthrough entity and whatever it would
25 be doing is something that gets reflected on your

1 personal tax returns?

2 A. That's correct.

3 Q. Was any of the \$175,000 transferred to anyone or
4 any other entity in the form of a loan or a gift or was
5 it basically spent on living expenses?

6 A. I don't believe that that -- you said living
7 expenses. I don't believe that I've ever even made that
8 statement.

9 Q. I'm asking what happened to the money. Was any
10 of it gifted away or --

11 A. No.

12 Q. -- loaned to anyone else?

13 A. No.

14 Q. And --

15 A. No.

16 Q. So if it wasn't gifted or loaned by J
17 Sandcastle, describe for me what you think the \$175,000
18 was used for?

19 A. I don't know. I -- I think I -- it's already
20 been answered. That was five years ago. I don't -- it
21 could be a myriad of things, attorneys fees, insurance,
22 just -- just whatever -- whatever the company needed is,
23 it's -- that's their money.

24 Q. When you say whatever the company needed and
25 that you previously said it wasn't living expenses -- and

1 I never said you said that -- I -- that's what I was
2 assuming, and apparently incorrectly. So let me just ask
3 and be very clear.

4 Was any of the \$175,000 used by you for living
5 expenses, including food or utilities or, you know, car
6 payments or anything else that would traditionally be
7 used as living expenses?

8 A. They -- the -- the J Sandcastle, I believe, paid
9 my car payment, it might have paid my insurance for the
10 car, and my cell phone bill. Just basic items that a
11 company would normally pay for its manager.

12 Q. When you said that the money was used by the
13 company for company purposes, including, you know, what
14 could be described as perks, was that your money or was
15 that J Sandcastle's money?

16 A. It's J Sandcastle's money.

17 Q. And so, if some creditor of you came along and
18 tried to collect from you, they would not have been able
19 to take that money that was in the J Sandcastle account,
20 correct?

21 A. I can't speak to that. I don't know. I don't
22 know the legal ramifications of that.

23 Q. I'm just asking for your personal understanding.

24 A. I don't know. I cannot answer that. That's a
25 legal question.

1 Q. I'm just -- I'm not asking you from a legal
2 question, what would a judge say. I'm asking from your
3 personal belief.

4 A. I don't --

5 Q. Was that your money?

6 A. I don't know.

7 Q. Let me just ask you this question.

8 Was that your money or J Sandcastle's money?

9 A. J Sandcastle's.

10 Q. How many different certificates of title has HCD
11 issued for the manufactured home?

12 From the very first one, being re-issuance from
13 Ryan to J Sandcastle as registered owner, that's No. 1,
14 how many different certificates of title from that point
15 forward?

16 A. Can you be a little more specific?

17 Q. Well, if -- if we're equating the certificate of
18 title to a car's pink slip, there's the one you get
19 issued when you purchase, and then I understand that
20 there have been a couple of, you know, one or more
21 different certificates after that point in time that
22 changes the owner or legal owner.

23 I just want to make sure I understand how many
24 different certificates of title has there been from the
25 time that the Ryan sale to J Sandcastle was first

1 reported to HCD.

2 A. Okay. I believe in 2020 -- in August 2020 was
3 the first -- maybe it was the second. J Sandcastle has
4 always remained the registered owner, but I believe that
5 a lienholder was added January 14th and then again
6 August 20th of 2020.

7 Q. So there's the first one in -- that resulted
8 from the January 2018 purchase.

9 And when was that certificate of title issued?

10 A. Sometime in 2019.

11 Q. Okay. And then the next change would have been
12 in January of 2020 --

13 A. No.

14 Q. -- and then in August of 2020?

15 A. January 14th was the next change, 2019.

16 Q. And then?

17 A. WJC.

18 Q. And then when?

19 A. Then August 20th, 2020.

20 Q. And so, there's three? There's the one issued
21 in January 2019 reflecting the sale from Ryan to J
22 Sandcastle, that's No. 1. Then there's one in January of
23 2019, that's No. 2. And then there's one in August of
24 2020, and that's No. 3?

25 A. That's correct.

1 Q. And then there hasn't been any since then?

2 A. January -- February. February 24th, 2021, and
3 then February 25th, 2000 and -- was it 21? God, it's
4 been so -- so February 24th and then February 25th is
5 when the registered owner changed, 2021.

6 Q. So there's been five certificates of title since
7 you first started occupying the manufactured home?

8 A. Because of lienholders added and removed, yes.

9 Q. Okay. But -- but five -- five is the number,
10 you're very confident of that?

11 A. Four or five, yeah.

12 Q. Okay. Going to the January 2019 certificate of
13 title, that's the first one that reflected J Sandcastle
14 as the registered owner, correct?

15 A. That's correct.

16 Q. And who was listed as the legal owner at that
17 time?

18 A. Well, at that time, I was not aware of how
19 relevant a certificate of title was with what they refer
20 to something as COTA in the State of California. The
21 only thing that I perfected was -- or J Sandcastle or
22 JPad perfected was the UCC on January 14th, 2019. In
23 hindsight, that should have also been reflected on what
24 they call COTA, certificate of title.

25 Q. Well, do you know what CODA stands for, if CODA

1 is C-O-D-A?

2 A. It's COTA, C-O-T-A.

3 Q. But what's the A for?

4 Certificate of title would be the COT. What's
5 the A for?

6 A. I -- that's just what they call it, COTA. I
7 don't know why they call it COTA. I, kind of, thought
8 the same thing. I know that certificate of title law is,
9 or code, whatever they call it. I don't know what the A
10 is.

11 Q. So who was reflected as the legal owner on that
12 first certificate of title?

13 A. The only perfected filing was under the Uniform
14 Commercial Code on --

15 Q. I --

16 A. -- February 14th, so there wasn't anybody
17 because I wasn't aware of COTA yet.

18 Q. Okay. So that -- the answer was -- the answer
19 is there -- there was no legal owner listed at that time
20 on the first certificate of title, correct?

21 A. That's correct with HCD.

22 Q. Okay. But what you're trying to explain to me
23 is that there's was, in fact, a UCC1 that had been filed
24 and should have been reflected on that certificate of
25 title?

1 A. That's correct.

2 Q. And who filed that first UCC1?

3 A. I did.

4 Q. And who was listed as the secured party?

5 A. So when I did the UCC, the secured party was
6 myself, and then I realized that I had listed myself as
7 the debtor. So then I did an AD -- what they said, AD-1,
8 my name was removed. And then my name was then listed as
9 the assignor to JPad.

10 Q. So when you're saying that your name was
11 removed, you're saying your name was removed as the
12 debtor, correct?

13 A. That's correct.

14 Q. And then at that same time, you changed the
15 secured party from yourself to JPad LLC?

16 A. That's correct.

17 Q. When was JPad LLC formed?

18 A. February -- I don't remember the exact date, but
19 February 2018.

20 Q. Was it formed to become the secured party on the
21 manufactured home?

22 A. No. This is February 2018.

23 Q. I'm sorry. So -- I had my date wrong. Why was
24 JPad formed?

25 A. Same reasons as J Sandcastle. I secured the

1 name.

2 Q. So no particular reason upon --

3 A. No.

4 Q. -- formation?

5 A. No.

6 Q. Why was JPad listed as the secured party and
7 legal owner of the manufactured home?

8 A. At that time. There were some other
9 circumstances in my life that were going on, and I needed
10 a manager to have authority to make decisions in my
11 absence -- or any person I gave the authority to in my
12 absence. I didn't have a will. I didn't have a living
13 trust. I didn't have any of those things.

14 Q. What agreements existed between J Sandcastle and
15 JPad that gave JPad the -- a lien against the property?

16 A. I was the signer.

17 Q. You were the signer, like you signed something?

18 A. Assignor, A-S-S-I-G-N-O-R. I was the assignor.

19 Q. Of what?

20 A. Of the note.

21 Q. So you're saying you assigned the note and your
22 rights under the security agreement as a lienholder to
23 JPad?

24 A. That's correct.

25 Q. And the result of that transaction was that JPad

1 became the recipient of the right to collect on the
2 \$225,000 note that was secured by the manufactured home?

3 A. That's correct.

4 Q. What, if anything, did JPad give to you in
5 exchange for this assignment?

6 A. Again, there's a security note. There's a note
7 and a promissory note. It's secured, the home.

8 Q. No, no. I'm asking, you gave up your right to
9 the note and the lien to JPad.

10 What did JPad give to you, if anything?

11 A. I don't have an answer to that because, again,
12 my intent was to -- because of personal situations or
13 circumstances that were going on at the time, I needed to
14 have somebody step into my shoes in my absence.

15 Q. So --

16 A. That was the whole purpose.

17 Q. So JPad didn't give you money to purchase the
18 note?

19 A. No.

20 Q. And the lien, correct?

21 A. No.

22 Q. And did it give you any other asset or thing of
23 value?

24 A. No.

25 Q. Upon its formation, who was -- who was or who

1 were the owners or members of JPad?

2 A. The only member of JPad at the time that it was
3 formed was Anthony Calderon, and a subsequent article of
4 organization, an L2 I believe it was, was executed on
5 October 18th, 2018, where I became the member.

6 Q. So by the time you were purchasing the
7 manufactured home, you were the only member of JPad,
8 correct?

9 A. I don't recall --

10 Q. Well --

11 A. -- I don't recall what happened to Anthony. I
12 don't -- that was back in 2018, so I don't recall --

13 Q. All I'm saying is you gave us the date that you
14 became the sole member on October 18th of 2018 --

15 A. No. It's --

16 Q. -- I believe you previously said you purchased
17 the manufactured home on October 31st of 2000 -- or
18 November 1st of 2018.

19 So at the time that you closed your purchase,
20 you were the only member of JPad?

21 A. No. That's not what I said.

22 Q. Okay. So please clarify.

23 A. Okay. So I believe that Anthony organized, I
24 guess, so to speak, JPad on February 9th, 2018. I
25 believe on October 18th, 2018, an LLC -- or I believe it

1 was an LC -- or L2 is an amendment to the article of
2 organization which added me, Jamie Gallian, to JPad, and
3 the document reflected that there was one or more
4 managers or members at that time.

5 Q. So what percent membership interest did you have
6 in JPad when you were added by this amendment in October
7 of 2018?

8 A. I don't recall.

9 Q. Was it less than 100 percent because it was
10 reflecting you and Mr. Calderon as members?

11 A. That's -- that's -- that's correct. I would --
12 yes, I would agree with that.

13 Q. Who is Mr. Calderon in relation to you?

14 A. Nobody. I don't know him.

15 Q. How did you come to find him?

16 A. I didn't find him. He is a friend of Ron, my
17 ex-husband's. And I believe that Anthony was the
18 organizer.

19 Q. What is Ron's last name?

20 A. Pierpont, P-I-E-R-P-E-O-N.

21 (Reporter clarification.)

22 THE WITNESS: P-I-E-R-P-O-N-T.

23 BY MR. HAYS:

24 Q. So is it -- is my understanding correct that it
25 was your idea to form JPad, and it was your idea for the

1 name of JPad, correct?

2 A. No.

3 Q. Okay. So whose idea was it to form JPad?

4 A. I believe it was Ron's.

5 Q. And when did you first ever hear of JPad?

6 A. After Ron told me that it had been formed. And
7 I thought, Well, that's cool. Okay. JPad, J Sandcastle.
8 So it was -- in Ron's mind, it was supposed to be Jamie's
9 pad and Jamie's sandcastle.

10 Q. So I just want to be clear because I think I
11 heard something originally when you were talking about
12 formation of JPad in February of 2018 and what I'm
13 hearing now, so I just want to make sure it's clear.

14 A. Uh-huh, uh-huh.

15 Q. It was not your idea to form JPad, and you never
16 heard of JPad until after it had been formed by
17 Mr. Pierpont and/or Mr. Calderon, correct?

18 A. No. The only person who formed it was Anthony.
19 The person who told me about it was Ron.

20 Q. But -- but again, you only learned about it
21 after it had been formed by Mr. Calderon?

22 A. That's correct.

23 Q. Okay.

24 A. Ms. Court Reporter, Calderon is spelled
25 C-A-L-D-E-R-O-N.

1 (Whereupon an off-the-record discussion was held.)

2 BY MR. HAYS:

3 Q. Ms. Gallian, when you were added as a member of
4 JPad in October of 2018, did you pay any money to
5 Mr. Caldron in exchange for your acquisition of that
6 membership interest?

7 A. No.

8 Q. Can you explain to us the history of ownership
9 of JPad -- finish the history, if you will?

10 You told us it was 100 percent Mr. Calderon, and
11 then you were added for some unknown percent in October
12 of 2018. What happened after that?

13 A. I believe what I said was the only function of
14 Mr. Calderon was the organizer or the -- he was the one
15 that did the paperwork, the incorporator I guess is what
16 you would call it. That's all I know.

17 Q. Who -- let me just make sure I got this point
18 clear.

19 Was the owner, upon formation, Mr. Calderon or
20 was it Mr. Pierpont?

21 A. Mr. Calderon.

22 Q. So Mr. Calderon was the owner and organizer upon
23 formation, and to the best of your knowledge, you were
24 added for some unknown percent, and that was the next
25 change in ownership in October of 2018?

1 A. Right. And you have to remember, you're dealing
2 with lay people. So when you talk about owners and those
3 types of things, I have learned a lot more now five years
4 later.

5 Q. All we're looking for here is the, like, actual
6 history.

7 So after October 2018, did the membership
8 interests in JPad change again?

9 A. I believe it did. However, I believe that the
10 tax returns did not reflect BIFs, and it was just opening
11 up too many cans of worms as far as -- yeah. I just --
12 there wasn't enough time in the -- time to investigate
13 everything. So I -- if you want to know exactly where it
14 stands, my intent is -- was that -- when it was amended
15 on October 18th, was that it was managed or members of
16 more than one. However, relationships have come and
17 gone, and -- and things have changed.

18 Q. I'm going to try to unpack that.

19 You -- you referenced tax returns.

20 A. Right.

21 Q. Had JPad filed tax returns at any point in time?

22 A. No. So again, that is another one of the
23 entities that comes over to mine, and my intent was to
24 gift a percentage to each one of the children. I
25 think -- I think, from what I was told -- again, you're

1 talking to a layperson here. I believe that the gift
2 amount each year was \$15,000. And I believe that my
3 intent was to gift each one of my children and my
4 granddaughter \$15,000 per year, but it just was getting
5 too complicated. I didn't know enough to be able to do
6 something like that.

7 So to answer your question, my intent was -- is
8 that a percentage amount would have been gifted to them
9 every year, but as far as reflecting that on my tax
10 return, that was not done.

11 Q. After you became a member of JPad in October of
12 2018, did documents ever get filed with the Secretary of
13 State to reflect that ownership of JPad changed after
14 that point in time?

15 A. I believe that there was always the SOI form,
16 the 12 form, was changed or updated, you know, on
17 whenever -- whenever the -- the date is you're supposed
18 to file it -- reflecting different managers at the time.

19 Q. And were the filings of those forms accurate
20 when they were filed?

21 A. I believe so.

22 Q. And so, if I wanted a more precise history of
23 ownership and membership interest in JPad, I would just
24 have to pull those forms and look at them?

25 A. But I don't think a manager is an owner. I

1 think -- I think you're missing that -- that it was --
2 the company was managed, as I have already testified,
3 that -- that I needed, in my absence, to be able to have
4 managers make decisions for me, and that's why the SOI
5 was updated.

6 Q. So -- so going back to my original question,
7 what is the history of ownership?

8 And so, I thought you were saying that the forms
9 that got filed were reflecting the different ownership
10 over time, but apparently that was reflecting the
11 different managers over time.

12 A. That's correct.

13 Q. So sticking specifically to the owners, what
14 were -- who were the owners at all times from
15 October 2018 to the present?

16 A. Just me.

17 Q. Did any document ever get filed removing
18 Mr. Calderon as an owner?

19 A. We only did the L2 that one time on October 18th
20 adding me. I believe he was listed as a manager only.

21 Q. And so, earlier I think I asked you, when you
22 became an owner, what was your percent ownership, and you
23 said, Unknown.

24 A. Right.

25 Q. And I said that is less than 100 percent, and

1 you said, correct.

2 A. Right.

3 Q. You are now saying you are the 100 percent
4 owner?

5 A. Right.

6 Q. So did anything change from October 2018 to
7 remove Mr. Calderon as an owner?

8 A. No. I don't believe so.

9 Q. Nothing formal, but your understanding is he's
10 not an owner?

11 A. No. I don't believe -- I think he was just the
12 the organizer -- I don't know, organizer, incorporator.
13 So no, he -- he was not an owner. He's not an owner.
14 He's a manager.

15 Q. So when you became a member in October 2018, are
16 you now saying that you believed you became the
17 100 percent owner?

18 A. That's correct.

19 Q. Member?

20 A. That's correct.

21 Q. Okay. And that's been the same from
22 October 2018 to the present?

23 A. That's correct.

24 THE REPORTER: If we can take a break at a
25 convenient time?

1 MR. HAYS: We can take a break right now. How
2 long would you suggest, Ms. Reporter? Ten minutes?

3 Okay. So we'll reconvene at 9:40, which is 11
4 1/2 minutes.

5 THE WITNESS: Okay.

6 MR. HAYS: Thank you, everybody.

7 (A recess was held from 9:28 a.m. until 9:46 a.m.)

8 MR. HAYS: Okay. We're back on the record at
9 9:46.

10 BY MR. HAYS:

11 Q. And when we took a break, I think you had been
12 testifying about ownership of JPad from October 2018 to
13 the present. And you said, at all times during that
14 period, you were the 100 percent owner, correct?

15 A. That's correct.

16 Q. Is JPad still an active LLC in good standing
17 with the Secretary of State?

18 A. They're in good standing with the Secretary of
19 State, both LLCs are. However, I was told, whether good,
20 bad, or indifferent -- or counselled that in order for me
21 to avoid paying the \$800, I needed to file the document
22 with them, the Secretary of State, and -- I don't
23 remember exactly what the document was called -- inactive
24 or something -- something. It was basically just to
25 avoid having to pay the extra \$800 per month for both --

1 or per year that California state tax or something.

2 Q. When you say you were counselled, who was
3 telling you this?

4 A. One of the attorneys, I'm not sure I remember
5 exactly which one.

6 Q. One of your attorneys?

7 A. Or a attorney. I can't even remember which one.
8 But I just remember that was the reason. They said, you
9 know, that you want to always remain in good standing
10 with the -- the -- California so that you're not, I don't
11 know, default or something. So that's what they told me
12 to do, which I did.

13 Q. When was this document filed that you're
14 referring to?

15 A. I believe in November of 2021. I don't recall
16 the exact date.

17 Q. Is JPad currently listed as the legal owner on
18 the certificate of title to the manufactured home?

19 A. Yes.

20 Q. Earlier we discussed the promissory note which
21 is listed in writing with a principle amount of \$225,000.

22 Were payments ever made on account of that note?

23 A. The note's not due until 2048. So there have
24 been principle payments made, however, not on a regular
25 basis. It wasn't anticipated that Covid would happen or

1 that I would lose my job or that -- for a variety of
2 reasons. So I re-read the note and made sure that it
3 states that it hasn't -- it's still in effect until
4 2048 -- or to 40 -- 2048.

5 Q. I think that you said -- and I'm looking at the
6 realtime transcript -- you re-read the note. That's what
7 you said?

8 A. Yeah, just to make sure that there wasn't
9 something in there --

10 Q. I just needed to hear that --

11 A. Yeah, yeah. I really just -- I hadn't read it
12 in several years.

13 Q. Okay. And I just wanted to make sure I heard
14 the word correctly.

15 A. Yeah, yeah.

16 Q. So under the -- what are the terms of the note?
17 Let's discuss that for a second.

18 A. I don't --

19 Q. Do you -- do you --

20 A. I don't have it in front of me. It wasn't part
21 of, you know, the discussion.

22 Q. Hold on. Hold on.

23 J Sandcastle is the obligor that owes the money,
24 correct?

25 A. That's correct. That's the way it was

1 originally set up.

2 Q. And the beneficiary of the money is you,
3 personally, correct?

4 A. I was the lender. Yes.

5 Q. Is there an interest rate in the note?

6 A. I believe you asked me that before, and I
7 believe it's 5 -- 5 percent or 5 1/2. Or maybe it wasn't
8 you that asked me. Somebody asked me what the interest
9 rate was. No. It was you in the 341.

10 Q. And what does the note provide as far as
11 payments?

12 Is it interest only? Principle only?

13 Principle --

14 A. I don't recall.

15 Q. -- tell -- tell me what you recall.

16 THE REPORTER: Sorry. I -- just real quick. I
17 really need you to remember to wait until the question is
18 finished. I'm missing when you guys interrupt each
19 other. So just pause and then finish.

20 THE WITNESS: So I don't recall what the
21 specific terms of the note are. You've asked me at the
22 341 -- I believe that I stated that the -- it was a fully
23 amortized note. I believe that the due date is 2048. I
24 believe that -- it seems to me that I might recall
25 something about \$1,200, and that would probably seem

1 about right if the note was amortized out for 30 years.

2 BY MR. HAYS:

3 Q. So your recollection is a 30-year term, fully
4 amortized, with a monthly payment of approximately
5 \$1,200?

6 A. I believe that -- it sounds correct, yes.

7 Q. Okay. And a minute or two ago, I think you said
8 some principle payments have been made.

9 Can you elaborate on that?

10 A. I've tried to do the best that I can as far --
11 so I don't recall exactly dates, times when, amounts. I
12 don't recall that. Again, this was five years ago, and
13 the intent was completely different than what has
14 happened five years later.

15 Q. How many payments would you estimate J
16 Sandcastle made to you?

17 A. Again, I don't -- I don't have a specific
18 amount.

19 Q. Do you believe it was more or less than 12?

20 A. I don't know.

21 Q. Do you know if it was more or less than 24?

22 A. I don't remember. I don't know. I don't have
23 an amount in my head. It's completely different than
24 what the initial purpose was set up for. It's -- it's
25 been completely changed. It's -- the terms -- the terms,

1 the purpose, the intent, it's -- it's five years later
2 and --

3 Q. So -- so -- hold on.

4 A. The whole thing needs to be redone.

5 Q. So -- so let's -- let's talk now about the
6 initial purpose and intent is what --

7 A. The initial purpose and intent was, for several
8 years -- and I think you and I have talked about this
9 before -- that the initial payment was -- the initial
10 intent of setting up the loan was all of my savings,
11 retirement. It was more of -- to force -- to force the
12 amount not to be squandered away, and to be paid, and
13 that eventually I would have income. That's the whole --
14 that was the whole purpose.

15 I didn't know whether I was going to be able to
16 get out of that three-year loan -- or that three-year
17 rental agreement. I didn't know if I was going to have
18 to rent this house. I didn't even know if I was going to
19 be allowed to rent the house. The purpose was -- has
20 been completely changed.

21 Q. You referred to a three-year rental agreement.

22 A. Yes.

23 Q. What is that?

24 A. So after the battery over at the Gables, I
25 wanted to get out of there as quickly as possible. So I

1 rented a home and signed a three-year lease agreement
2 with Henry Newton for the property at 5782 Pinon Drive.
3 It was a three-year term. It was \$3,400 a month.

4 Q. So you're saying one of the purposes of setting
5 up the loan was that you had signed this three-year lease
6 and you weren't sure if you were going to be able to get
7 out of the lease, correct?

8 A. Well, because that would meant -- that would
9 mean -- I had been looking to purchase a home in here.
10 The first two fell through. I had opened escrow in July
11 of 2018, two months before I even signed that note. I
12 mean, everything was -- you know, I was flying a lot that
13 summer and everything was just moving so fast in here. I
14 mean, there was things that had offers on it before it
15 actually even was listed to the public.

16 And I didn't have money to be able -- or even
17 anything, I didn't have -- the house at Alderport hadn't
18 sold yet. So there was a whole lot of reasons to protect
19 the money and make sure that it was getting paid back as
20 income if I had to rent this house if -- because if I had
21 to -- to stay in the other house. I mean, there was a
22 whole lot of different reasons.

23 Q. When did you sign this three-year lease?

24 A. 9-11-18.

25 Q. And were you ultimately able to get out of the

1 lease?

2 A. I did. If you look closely enough, the last
3 payment -- if you look closely enough at the Chase -- my
4 chase account, I paid the rent through -- what do you
5 call those, like, when the landlord wants you to pay,
6 like, direct deposits -- I believe the last payment I
7 made was December of 2018 or November of 2018, one of
8 those months. However, I had to pay all the utilities on
9 the property through February of 2019.

10 My deposit check finally came after much
11 negotiation back and forth. So I believe that when the
12 deposit check finally came and then I paid the last
13 utility, I believe that I was finally relieved of my
14 three-year obligation by February 2019.

15 Q. So one of the purposes of putting title to the
16 manufactured home in J Sandcastle and putting a lien
17 against the property was to protect the money because of
18 this three-year lease, correct?

19 A. Because it was -- it was really possible that I
20 would have had to do, you know, short-term leases,
21 whatever the city ordinance here allows -- Huntington
22 Beach now does allow short-term leases, and I wanted to
23 be protected if there were going to be tenants in here,
24 subtenants I guess, and I wanted the money to go towards
25 paying off the -- the note.

1 I think Ron and I were putting our marriage back
2 together, and I'm certainly not going to support a man.
3 So again, the whole purpose was -- the way that I looked
4 at it is -- I was a bank and I was making a loan, and
5 that my upside of that was to be able to collect interest
6 over the term of the loan and have income. I didn't -- I
7 was on a leave of absence -- the medical leave of
8 absence. So that was the whole purpose. But that all
9 changed. I didn't realize that the -- the injury was as
10 bad as it did; the marriage, you know, fell apart again;
11 and then this nonsense with Houser started. So things
12 changed.

13 Q. What -- what benefit was there to -- I'm not
14 following entirely?

15 A. Okay.

16 Q. So what benefit was there to you of using the
17 LLCs to be on title as registered owner and legal owner
18 as opposed to you individually?

19 A. Because I didn't live here, it was going to be a
20 rental. It was going to be a rental, you know, for -- to
21 protect me for whatever the renters did. That was the
22 purpose. But that all changed.

23 Q. Can --

24 A. Lisa Ryan, you know, had asked if she could take
25 over the three-year, and I'm, like, No, I don't -- I

1 don't want to get -- I don't want to get involved in
2 this. I think she submitted or contacted the landlord to
3 see if she could take over it, but I wasn't willing to
4 assign a three-year lease. No. I wanted off the lease.

5 Q. When did you first start residing in the
6 manufactured home?

7 A. Sometime in November. I was back and forth
8 between both of the homes.

9 Q. And so, sometime in November 2018 to the
10 present, you've been exclusively in the manufactured
11 home?

12 A. That's correct.

13 Q. Okay. How was J Sandcastle going to earn money
14 in order to service the note by making the payments?

15 A. For the rental. That was the purpose is renting
16 this house at fair market value, and they were going to
17 service the note to me with the interest, and that was
18 the point is so that I could have income.

19 Q. How is that any different than if you had become
20 the owner and rented and would have received the income
21 directly from the tenants?

22 A. Because I didn't live here and it was a
23 liability -- it's a liability on me personally to have
24 renters in the home. That's just the way I did it.
25 Again, I didn't have a legal background. It's just what

1 I came up with --

2 Q. And you --

3 A. -- trying to solve the problem.

4 Q. And then you've been living there exclusively
5 since November 2018 without renting it to third parties
6 with you living elsewhere. So --

7 A. I -- you have to slow down. You have to repeat
8 that again. I kind of lost you there.

9 Q. Sure. So you said at first you set this up
10 thinking you might have to rent the property and then you
11 didn't want to be on title and be the landlord
12 individually to these renters and have liability or
13 potential liability to the renters, I think you said.

14 A. Correct.

15 Q. So the question is, when that changed and you
16 moved into the home exclusively in 2018 to the present,
17 why did you leave J Sandcastle on as registered owner and
18 JPad on as legal owner?

19 A. That -- that's important to mention. I'm glad
20 you asked that question because the whole -- it -- a lot
21 of things happened during that 60-day period.

22 You've got the Houser attorney continuing to
23 file documents in the -- the -- Lisa Ryan's name. So
24 that was the biggest -- that was the biggest question is,
25 like, why is this -- why is this happening? Why -- if

1 you know I'm the owner, you've been given notice by the
2 owner, you made an agreement that she was going to sell
3 the home, you knew she was going to sell the home, she
4 sold the home, you moved out, you were paid the amount,
5 it's like, why are you still filing documents in the old
6 owner's name? It's -- it's like the whole thing is just,
7 like, a cluster you-know-what. It just didn't make sense
8 to me. So that's why.

9 Q. But -- but you --

10 A. You know, and --

11 Q. Hold on.

12 How is putting the registered owner and legal
13 owner in the name of the LLCs any different or providing
14 you any additional protection than just putting it in
15 your individual name? That's the part I'm not following.

16 A. Mr. Hays, I don't know the legal ramifications
17 of whether it's good, bad, or indifferent. I just know
18 that this is what I've seen happen, that, if you have a
19 rental property, you put it in the name of the LLC, it
20 protects you personally, you're only exposed to something
21 about as far as the LLC, they can't come after you. That
22 was the whole purpose.

23 Q. But -- but I understand that that was the
24 initial purpose, but then things changed during the
25 60-day period, you reference.

1 A. Right, right.

2 Q. And you said it was important I brought it up.

3 A. Right.

4 Q. And then you discussed that the Houser Bros.

5 kept pursuing Lisa Ryan, and so, that was the reason why
6 you kept things in the LLC --

7 A. Well --

8 Q. -- instead of just putting it your individual
9 name --

10 A. Well, however --

11 Q. Hold on. Hold on. That's the part that I'm not
12 following --

13 A. Okay.

14 Q. -- that I need you to tell us what your intent
15 was and why you thought the LLCs would provide you better
16 protection than having it in your individual name
17 vis-a-vis the Lisa Ryan issue.

18 A. Correct. Okay. So one of the things that we
19 haven't touched on was J Sandcastle as the registered
20 owner was also the resident applicant. So -- with the
21 residency application. However, at that time, I think
22 there was some -- and I can't speak for Houser, but it
23 appears that Houser focused in on Jamie Gallian instead
24 of reading that Jamie Gallian signed as the member of J
25 Sandcastle. So I believe that J Sandcastle was the --

1 the applicant, J Sandcastle was the registered owner,
2 Jamie Gallian had a three-year lease hanging over her
3 head, the home quite possibly could have had to be rented
4 as a short-term rental, but all of the -- all of those --
5 all of those situations changed and -- and I ended up
6 getting out of the lease. I ended up moving over here,
7 but yet the -- the issue with Houser continuing to
8 convolute and recognize J Sandcastle or Jamie Gallian or
9 anybody else besides Lisa Ryan continued until April of
10 2019.

11 Q. Did you -- at the time you were purchasing the
12 manufactured home, isn't it true that you had some
13 litigation that you were a party to with the Gables or
14 somebody else?

15 A. That's correct.

16 Q. And was putting -- was using the LLCs on title
17 and lienholder also protecting your equity in the
18 property?

19 A. No. Because it -- my -- I didn't have any
20 liens. There were no judgements. I sold the home
21 unencumbered, so it wasn't a thought.

22 Q. I'm saying you were -- I'm saying you were a
23 party to litigation which could have resulted in a
24 judgment against you, and did you view using the LLCs on
25 title and as lienholder as providing you some protection

1 against any possible judgment that would be entered
2 against you in the future?

3 A. No. I don't believe that ever even came into my
4 mind. I was very transparent with the judge, and the
5 judge was very supportive of me getting out of there, and
6 that's exactly what I did. The judge and the attorneys
7 for HOA -- the HOA, and the HOA, I think it's no -- it's
8 no secret that, you know, we -- I had agreed in March of
9 2018 to sell the property.

10 The landlord or sublessor, or whatever you want
11 to call them, was very supportive. My attorneys were in
12 contact with him almost daily. They sent me an e-mail on
13 November 1st and approved the sale. So there would be no
14 reason for that -- those thoughts to come into my head.

15 Q. But isn't it true that judgements were later
16 entered against you in that litigation?

17 A. That was months later. So I didn't think of it.
18 I didn't -- it didn't -- as a -- as a layperson, you
19 don't -- I wasn't even thinking that. I mean, I was
20 completely shocked, as well as anybody that was in my
21 circle or my attorneys -- completely shocked when that
22 judgment came down, what, eight months later.

23 Q. You were talking earlier about the number of
24 certificates of title, and I think you said it was four
25 or five, and the very first one was J Sandcastle as

1 registered owner with no legal owner, correct?

2 A. Except for the UCC I mentioned.

3 Q. I'm just talking about what appeared on the face
4 of the document.

5 And then because the document wasn't accurate,
6 there was the amendment in early 2019 to add JPad as the
7 secured creditor or lienholder, right?

8 A. Say that again. Oh, I'm sorry. My screen went
9 black here. Okay.

10 Q. Do you need me to repeat?

11 A. No. I got it here. Sure. Go ahead.

12 Q. Because that original certificate of title did
13 not reflect the lienholder, but there was a UCC 1 out
14 there that had been filed, the certificate of title was
15 amended in early 2019 to reflect JPad as the lienholder,
16 correct?

17 A. No. I don't believe that's when it happened,
18 but -- I --

19 Q. When did --

20 A. -- believe that it wasn't recorded. I don't --
21 I believe that it didn't hit the HCDs certificate of
22 title -- God, I don't even recall when they -- when they
23 changed the certificate of -- every time you change or
24 add something to the CD, the certificate of title, it
25 takes months for it to get processed. So I don't recall

1 when it finally got entered or corrected -- or not
2 corrected. That's not a right word. But when I finally
3 got the next original in the mail, I don't recall when it
4 was.

5 I do recall that I was not familiar with COTA
6 and that the way to give public notice was through UCC
7 filings. That's what I was aware of.

8 Q. Earlier you said the date of January 14, 2019,
9 in connection with this issue. What was that date?

10 A. Those are the -- those are the recordings of the
11 UCC filings. That's the recording date or the file date
12 with the State of California giving public notice of the
13 encumbrance.

14 Q. And so, sometime after that date, a request was
15 made of HCD to reissue the certificate of title?

16 A. I believe it -- they both happened at the same
17 time. You know, Mr. -- Mr. Hays, quite honestly, I don't
18 know -- I -- I don't know the exact date. I just know
19 that when the -- the UCCs were recorded, the file dates
20 are January 14, 2019, with public notice, the next
21 certificate of title seem to be August 20th, 2028, and I
22 think that was the typo because the -- the notarization
23 is the 28th. So I don't know why they put the 20th.

24 Q. And what year was that?

25 A. 2020.

1 Q. So you think the next certificate of title is in
2 August of 2020, correct?

3 A. That's the next one that reflects the actual
4 COTA changing to JPad and Ron Pierpont.

5 Q. And this is the first certificate of title that
6 reflects on its face the JPad Pierpont lienholder?

7 A. That's correct.

8 Q. So that would be the second certificate of
9 title, correct?

10 A. Second or third.

11 Q. Do you think --

12 A. I don't recall. I don't have the documents in
13 front of me, but --

14 Q. But -- but I'm asking you to give me a
15 recollection. And the first one reflected J Sandcastle
16 as registered owner and no legal owner. And then there
17 was a second one that was issued to reflect J Sandcastle
18 as registered owner and JPad as legal owner.

19 And you believe this was in August of 2020,
20 correct?

21 A. That's correct.

22 Q. All right.

23 A. Yeah. To the best of what I can remember
24 without documents in front of me or being shown to me,
25 that's correct. I believe it was August of 2020.

1 Q. Okay. What do you believe to be the next
2 certificate of title that was issued?

3 A. The 24th of February 2021.

4 Q. And that's not the issued date, though, correct?

5 A. That's the date that it was -- it is effective.

6 Q. That's not --

7 A. The --

8 Q. -- that's not the date that the HCD handed you a
9 piece of paper, correct?

10 A. No. I believe that is the date. I believe it's
11 right down there in tiny, tiny little print on the face
12 of that document. It says 2-24.

13 Q. I thought that what that was -- and you tell me
14 if you believe it's different -- is that the February 24,
15 2021, date is the date that a transfer was effective.
16 That transfer then gets submitted to HCD for an
17 application to modify the title, and then the modified
18 title comes out later; is that correct?

19 A. With the effective date of the transfer is the
20 way that I understand it.

21 Q. I understand. I'm just trying to get the timing
22 down here.

23 A. Yeah, yeah.

24 Q. And so --

25 A. I believe it started -- if -- if -- I know I

1 provided tons of e-mails between HCD and me. I believe
2 that transaction started at the beginning of February,
3 and I don't know why it took them three or four weeks to
4 finally get it right, but I know that they kept calling
5 me because they were -- something about having
6 "Mr. Pierpont and" -- with a company -- or with the name
7 of the LLC -- they were saying -- I would do it one way
8 and then they would call and say, No, we found out that
9 you have to do it this way, and then they would change it
10 again.

11 So the -- the -- those are two separate -- two
12 separate. Mr. Pierpont is not a member of JPad.

13 Q. All right. I think that there's a date stamp on
14 the front of the title that says -- that has the
15 February 24, 2021, date that says July 14, 2021.

16 A. That's correct. That's the day that I have
17 since -- and if you actually -- this is how I came up
18 with that, because I'm, like, July 14th -- where did that
19 come from? So I called and asked.

20 That's the day that they opened the envelope.
21 They stamp it. Or like when I turned in the Lisa Ryan
22 certificate, it's stamped November 16th, but you don't
23 get it until months later.

24 Q. So my -- my question, if I can finish, is that
25 that July 14th of 2021 date stamp is a stamp put on the

1 document by the HCD, correct?

2 A. That's what I would think.

3 Q. But -- but --

4 A. It seems like it -- seemed like it made sense.

5 Q. -- it wasn't put on the document by you,
6 correct?

7 A. No, no.

8 Q. And the date that you received this document
9 back from HCD would have been some date after July 14 of
10 2021?

11 A. That's correct.

12 Q. Okay. And do you know when you received the
13 document back?

14 A. I believe my first inquiry was through these
15 \$35 -- it may have been \$25, but I think it was 35 --
16 title searches. Because I'm, like, what is taking so
17 long? Then I -- then I got a title search that said --
18 it reflected Jamie Gallian as 2-25-2021, and I'm, like,
19 what happened to JPad? Because they took JPad and Ron
20 Pierpont off. It wasn't supposed to be both. It was
21 supposed to be one. It was supposed to be only Ron
22 Pierpont.

23 So then I contacted them and I said -- actually,
24 that was during COVID, so we weren't sure whether the
25 office was even open -- there's one in San Luis Obispo,

1 one in Riverside, what office is going to be open. I
2 contacted them -- I believe the e-mail I have is July 7th
3 or 8th -- and said, Are you open?

4 And I finally got an e-mail back that said, Yes,
5 we're open, limited hours. So I told them what the
6 situation was and they said, Have you gotten the original
7 from Sacramento? I said no. They said, Well, you have
8 to wait until you get the original.

9 So I believe I got it around -- the original,
10 around August 4th, and I think the following workday
11 would have -- or the next workday would have been, like,
12 the 5th or 6th, and I actually drove it out there. They
13 said that I had to bring it to them in order to correct
14 it to put JPad back on. And that's how that happened.

15 Q. And that resulted in another, new, fourth
16 certificate of title?

17 A. Yeah. I had to deliver the -- the one that took
18 JPad and Ron off, delivered that back to them, had to pay
19 another \$115 or 16, whatever it was. They said, You know
20 we're going to charge you again? I said, I know. It's
21 okay. So I paid it there at the office.

22 And then I got an e-mail from a technician with
23 another title search that it was corrected, and they
24 said, you know, give it some time because these only come
25 from Sacramento. However, the first document that comes

1 is the registration card -- well -- yeah, the
2 registration card is just a white, soft, 8 1/2 x 11 piece
3 of paper. And then the registration -- or the
4 certificate of title card is sent to the address that
5 reflects the legal owner, which was Torrance. And I --
6 and he got it really quick, Mr. -- Bob got it really
7 quick. The way that they made it sound like it would be
8 weeks, and I think he got it within, like, a week.

9 Q. So the February 25, 2021, date?

10 A. Uh-huh.

11 Q. That's a date that or J Sandcastle or JPad,
12 somebody puts on a form to submit to HCD, correct?

13 A. No. That's the day that I released -- well, not
14 I. That's the day that J Sandcastle released their
15 interest as the registered owner in the manufactured home
16 to me.

17 Q. My -- my question was, that's a date provided to
18 HCD by you or J Sandcastle. That's not a date that HCD
19 would otherwise have on its own, correct?

20 A. No. That's the -- that HCD document -- or that
21 date that the HCD takes is on the back of the certificate
22 of title form.

23 Q. But -- but I'm saying that's a date that you
24 provide to them --

25 A. Yeah.

1 Q. -- correct?

2 A. It was a notarized signature, yes.

3 Q. Okay. And that was my next question is how do
4 we know that it happened at or about that time --

5 A. Because --

6 Q. -- and --

7 A. -- it was notarized, twice.

8 Q. And you've provided us with that notary
9 acknowledgement in the documents, correct?

10 A. Yes, I have.

11 Q. And --

12 A. It's in your -- it's in your documents, as well.

13 Q. And I'll -- I think I have it up on the screen
14 here. So let me see if I'm smart enough to do a screen
15 share.

16 A. And I think that -- I believe I asked -- sent
17 you back your documents yesterday and put page numbers,
18 if we could use the page numbers so that I can get to it
19 easily.

20 Q. It's page 5 of 461.

21 A. Okay.

22 Q. In the PDF. And that's an acknowledgement of
23 February 25, 2021, by a notary Greg Buysman, or something
24 like that.

25 A. Yeah. He's at the local UPS store here.

1 Q. Okay. And so -- oh, Buysman. I see it -- it's
2 spelled out below. I was trying to read the printing.
3 B-U-Y-S-M-A-N.

4 And so, you went into the UPS store and had this
5 notary acknowledge that this document -- this certificate
6 of title was being signed on February 25th of 2021,
7 correct?

8 A. That's correct. However -- if you stop
9 scrolling for a second -- what he notarized -- go up a
10 little bit. No, up, up, up, up. Okay. Okay. So what
11 he's notarizing -- I'm sorry. Can you show me the first
12 line under the signature? No. Go, go -- well, I guess
13 down. Is that what you're -- okay. Stop.

14 So what he's notarizing is this section right
15 here, the date that I released section B is what he's --
16 what he's -- you see the 2-25 right here?

17 Q. Yeah. I see it. So that's what's notarized and
18 then ultimately submitted to HCD, correct?

19 A. Yes. However, don't forget the tax clearance
20 certificate. That was a nightmare

21 (Reporter clarification.)

22 THE WITNESS: It's called the tax clearance
23 certificate.

24 BY MR. HAYS:

25 Q. So why don't you tell us what this is and why it

1 was a nightmare?

2 A. Well, because the HCD does not change a --
3 change a certificate of title without paying the current
4 taxes and a year in advance, and I didn't have the money
5 for that. And that's why there's such a difference
6 between -- you see this date right here is July 9th.

7 Q. Of 2021, correct?

8 A. That's right. That's the day that I filed
9 bankruptcy. That's when I had -- that's the only time I
10 had the money to pay all that. I didn't realize that
11 they -- they charge so -- they -- they --

12 And I go, Why are you charging me, like, two or
13 three years?

14 That's our policy.

15 I'm like, That can't be the policy. But it's --
16 it's what they do.

17 Q. So you submitted the request for the title to be
18 reissued --

19 A. Uh-huh.

20 Q. -- based on the February 2021 release?

21 A. Right, but I didn't have a tax clearance
22 certificate.

23 Q. And then you were notified that they would not
24 reissue the title until you get this tax clearance
25 certificate?

1 A. That's correct. And that's why, finally, when I
2 got everything, that's why I believed that July 14th
3 stamp is finally on when they started making -- when they
4 finally officially started making the change.

5 Q. And so, when -- what resulted in this tax
6 clearance certificate getting issued? You submitted some
7 money?

8 A. Yeah. You have to pay the current plus a year
9 in advance.

10 Q. And the money that you paid was paid on
11 July 9th --

12 A. Correct.

13 Q. -- 2021?

14 A. That's correct.

15 Q. And in what form did you pay it?

16 A. My Capital One charge card, my VISA card.

17 Q. Did you have to submit any other paperwork on
18 that date or was it just make the payment?

19 A. No. You order it online and you go and pick it
20 up with -- and, you know, obviously besides give the
21 money, but that's it.

22 Q. So on July 9, you go online on the computer --

23 A. And order it again. Because, see, it's only
24 good for -- when you order it -- I ordered it in -- you
25 know, a long time ago, but I didn't know they were going

1 to charge me two years. So I never went and picked it up
2 the first time. And then it wasn't until the 9th that I
3 had all the money. I went down there, I paid it, and
4 then that certificate is good for 90 days.

5 Q. Okay. Let me stop you right there. You said
6 you went down and paid it, and earlier I thought you said
7 you paid online with your charge card?

8 A. No, no, no. You order it. No. You order the
9 certificate. Okay. They don't -- you -- you have to
10 order it. You can go to the Orange County tax assessor
11 and you drop down to the mobile home, and you type in
12 there, and you order this tax clearance certificate, and
13 they call you and tell you when it's ready.

14 Or you can follow up and say, Hey, you know
15 what, I've been waiting a long time, you know, can you
16 possibly find the time to do this today? And I went down
17 to the office, the tax clearance -- or the tax assessor's
18 office and paid the bill with my Capital One VISA card.

19 Q. So --

20 A. And then they give you this document.

21 Q. So on July 9th of 2021, you were standing in the
22 tax collector's office with a charge card paying the
23 money that they required?

24 A. Yes. Before I filed bankruptcy. It was in the
25 morning that I was there and the -- the -- I don't know,

1 Bankruptcy Court was in the afternoon, like, 2:00 or
2 something.

3 Q. And then when you got this piece of paper --

4 A. Uh-huh.

5 Q. -- handed to you, this original piece of paper
6 with the fancy stamp on it?

7 A. Yep.

8 Q. What do you do with that?

9 A. You have to send it up to Sacramento.

10 Q. So you then mailed it to Sacramento?

11 A. Or I could have scanned it into my computer,
12 either one. I don't remember which, how -- how it got
13 there. But they have the original, so I think I followed
14 up with the original.

15 Q. So you think you mailed the original to them and
16 that's why, on July 14, five days later, they finally put
17 a stamp on it like they're now processing all of this?

18 A. That's correct.

19 Q. Okay. And then sometime after July 14th, you
20 get the brand new, original certificate of title back in
21 the mail?

22 A. Yeah. Well, yeah, but I think that what I said
23 was -- is that I had thought, you know, what is taking so
24 long? I didn't realize that Sacramento is the only one
25 that -- that processes original, you know, so to speak,

1 these big pink slips. So anyway -- so that's what
2 happened.

3 So I remember I said that I had to wait because
4 I noticed on the -- what do you call it -- the title
5 search that whoever processed it took JPad and Ron
6 Pierpont off, and that was not the intent.

7 Q. I understand. So the -- I want to make sure
8 that the documents are -- that we've been referring to
9 are clearly marked as exhibits. And so --

10 A. They are, but they're out of order, and you've
11 got -- and that's why I wanted to do the page numbers so
12 that --

13 Q. But -- but just hold on. Hold on.

14 A. Go ahead. I'm sorry.

15 Q. I'm trying to -- I'm trying to ask a question
16 and we need to --

17 A. I'm sorry.

18 Q. -- keep the reporter happy with both of us.

19 So the first piece of paper that shows the
20 July 14th stamp is now up on the screen. It's page of 3
21 of 461.

22 Is that the front page of the title that got
23 issued after the tax clearance certificate?

24 A. No. That's the -- that's the original
25 certificate of title, the February 24th one, 2021. If

1 you look down here at the bottom -- if you go up a little
2 bit -- tiny, tiny print, there should be -- okay. See
3 right there underneath the word "department," see
4 right -- those -- those numbers down there 02-24, way
5 down underneath the word, Department.

6 Q. Yes, yes.

7 A. That's the day I come to find out -- or come to
8 learn that's their little date on there where they mail
9 this document, but that's just my own -- I don't work
10 there, so I don't know what they do.

11 Q. So --

12 A. -- I, kind of, figured out that's -- must be
13 what that means.

14 Q. Hold on. Hold on. I'm trying to figure out
15 because all of this is in one big PDF --

16 A. Uh-huh.

17 Q. -- what is the first page of the title.

18 Is this the first page?

19 A. Correct.

20 Q. Okay. And is it a one-page document?

21 A. This is the back.

22 Q. So the back of page 3 of 461 is what's up on the
23 screen now, which is page 4 of 461.

24 A. Correct. But that -- that -- this document that
25 was submitted to HCD wasn't -- well, let's see. No.

1 Okay.

2 So because the tax clearance certificate had J
3 Sandcastle and Jamie Gallian, they said I had to sign it
4 and put it in both names, and I said, No, that defeats
5 the whole purpose. So we argued about that back and
6 forth, and I think one of your exhibits here -- Rebecca
7 whatever, I don't know, O'Laughlin or something, does
8 a -- does a memo or something that she spoke to me after
9 I contacted the tax assessor's office.

10 And I said, Why would you put both names on
11 there? Because that's not how -- when you go online
12 under the tax assessor's portal and order this document,
13 that's not what it said. It did not say Jamie Gallian
14 and J Sandcastle, or J Sandcastle and Jamie Gallian. So
15 I don't know why they did that, and I didn't notice it
16 when I -- when I picked it up. And so, she called me.

17 Q. Let me stop for a second. I'm trying to figure
18 out which pages of this big PDF constitute a single
19 document so that I can -- can call that Exhibit 1 for the
20 record.

21 A. Okay.

22 Q. So -- so going to page 3, it's entitled,
23 Certificate of title, near the top.

24 A. Uh-huh.

25 Q. And that's the front page of a document, and

1 then page 4 is the back of that same document, correct?

2 A. That's correct.

3 Q. And -- and that's the only pages that are part
4 of that document?

5 A. That's -- that's correct.

6 Q. Okay.

7 A. But it -- yeah, the hard copy. It's, like, a --

8 Q. So -- so --

9 A. -- a beige color or something.

10 Q. So pages 3 and 4 will be marked as Exhibit 1 for
11 purposes of reference.

12 A. Uh-huh.

13 (Exhibit 1 was marked for identification.)

14 BY MR. HAYS:

15 Q. The acknowledgement, which is page 5, is not
16 something that was physically stapled to the certificate
17 that HCD issued, correct?

18 A. It -- well, yeah. I had to give it to them. I
19 gave it to them at the same time, but that -- I sent the
20 original. They have the original acknowledgement.

21 Q. So --

22 A. They have the wet copy, I guess, is what they
23 referred to it as.

24 Q. So when they mailed you Exhibit 1 back, the
25 acknowledgement was on it? This -- this piece of paper

1 was included?

2 A. No, no. That's -- no. The original was already
3 at HCD, is already at HCD, the -- they have the wet inked
4 copy, both of them.

5 Q. So this should be as hard as it is. I don't
6 know if it's me or you, but let me try one more time.

7 When you opened the mail and you got Exhibit 1
8 which is pages 3 and 4, was --

9 A. No.

10 Q. -- was that the only piece of paper in the
11 envelope?

12 A. Okay. I didn't get 3 and 4. I sent 3 and 4.
13 3, 4, and 5 went to HCD.

14 Q. So -- so 3, 4, and 5 is a single document, which
15 will be marked as Exhibit 1, which was your application
16 and submission to HCD.

17 A. Uh-huh. With --

18 Q. Okay.

19 A. -- the tax clearance certificate, eventually.

20 Q. And then, subsequently, the tax clearance
21 certificate gets submitted to them, which we will call
22 Exhibit 2.

23 A. Okay.

24 (Exhibit 2 was marked for identification.)

25 //

1 BY MR. HAYS:

2 Q. Okay. And then in response, they issued an --
3 an original certificate of title?

4 A. Right. And that's your next document right
5 there. Go -- go -- stop. See right there where it says
6 August 3rd?

7 Q. Yes.

8 A. Okay. That's when they actually -- and if you
9 go down to the bottom, it will say August 3rd, right --
10 see right there, August 3rd, 2021?

11 Okay. That's when they mailed it, and I believe
12 I got it on the 5th. And that's when I took that
13 document and drove it to HCD and gave to them, because
14 this August 3rd took off JPad.

15 Q. And so, this August 10th down at the bottom is
16 an HCD stamp?

17 A. That's right. That's when they got it back up
18 in Sacramento and they processed it -- keep going down --
19 keep going.

20 Q. I don't --

21 A. Whenever -- whenever you see the HCD, that's, I
22 think, August 10th or 11th. That's what that is, is they
23 mailed it again.

24 Q. Okay. And so -- and so, the -- it's not
25 included in these exhibits, but I understand what you're

1 saying.

2 A. You have it in there or something, Exhibit 22,
3 or something. It's there.

4 Q. You -- you marked it as Exhibit 22?

5 A. It's down there somewhere. Something -- it's
6 one of those way at the bottom.

7 Q. I'm going back to what you had marked. These
8 are the ones that you had sent.

9 A. Oh, I'm -- okay. I'm sorry. I'm sorry. I saw
10 it in there -- you know what, I might -- I might be
11 confusing it with your exhibits in the motion.

12 Q. Yeah.

13 A. That's probably where --

14 (Multiple speakers simultaneously.)

15 THE REPORTER: Okay. I'm sorry. I cannot get
16 you both at the same time. One at a time, please.

17 THE WITNESS: So Mr. Hays, stay right there --
18 right there. See -- see right there, August 11th, Sylvia
19 Cruz, so that's when -- what I figured out -- again, I
20 don't work there, but what I figured out by staring at
21 all these documents, that's the day -- that date will be
22 on the bottom, again, what is that -- see -- no. That's
23 not -- that's not the one -- you have to find the one
24 that says, Issued August 11th, and at the bottom, it will
25 say the same thing.

1 BY MR. HAYS:

2 Q. Okay. At least I understand now.

3 A. Okay.

4 Q. And --

5 A. That's all -- again, I don't work there, but
6 this is, kind of, what my own personal -- just in -- and
7 the way things are cycled and when I received things.

8 So if you look at that one document that you
9 just scrolled through -- just -- keep -- no, up a little
10 bit, okay. See that date right there, August 6th, that's
11 the day that I had to provide this Statement of Facts
12 with the original August 3rd certificate and pay the
13 extra, the second payment. That was the document, and
14 it's dated August 6th because I executed it there.

15 Q. And this is page 396 of 461 which we will mark
16 as Exhibit 3.

17 (Exhibit 3 was marked for identification.)

18 BY MR. HAYS:

19 Q. And the purpose of this document was to get a
20 new title issued that still reflected JPad as the legal
21 owner, correct?

22 A. Correct.

23 Q. Okay. And that's the way that title remains to
24 this day is -- as reflected on the August 11th
25 certificate of title?

1 A. That's correct.

2 Q. And that is J Sandcastle as legal owner -- or,
3 no, Jamie as legal owner and JPad -- Jamie as registered
4 owner and JPad as legal owner?

5 A. Correct.

6 Q. Okay.

7 (Off the record discussion.)

8 BY MR. HAYS:

9 Q. Ms. Gallian, what prompted J Sandcastle to
10 transfer its registered owner status to you in 2021?

11 A. Houser and I participated in one mediation and a
12 second mandatory settlement conference, and I also
13 received an e-mail from the attorney stating that Houser
14 will not issue a lease agreement in the name of a
15 company. And I had told the mediator in the Zoom room or
16 whatever, I said, Fine. I said, I will put it in my
17 name. And he said, Fine. That was it.

18 Q. Do you recall when that mediation occurred?

19 A. I don't remember. I don't remember. I have the
20 e-mail, I -- I -- if you need it, I will forward -- I
21 will forward it to you.

22 Q. Let's leave a blank in the transcript. And
23 Ms. Gallian, you're going to get a chance to read the
24 transcript and make sure it's accurate. And can you fill
25 in the blank what you believe the date of the mediation

1 was?

2 A. There was two.

3 Q. The dates, plural, of the mediations, plural,
4 and then if you could also just separately forward that
5 e-mail you're referring to?

6 A. Yeah, of course. No problem.

7

8

9 Q. Does the promissory note still exist in the
10 sense that it's still an obligation of J Sandcastle to
11 repay the debt?

12 A. I need to get legal advice on what to do,
13 because I still have the intent of replenishing and just
14 trying either -- either to rent the house or to do
15 something that forces the obligation to be satisfied.

16 Q. So -- so the debt still exists, and you're
17 saying you want to do something to --

18 A. I want to get -- I want to get legal advice.

19 Q. Hold on. Hold on.

20 A. Right.

21 Q. The debt still exists and you want to do
22 something to put J Sandcastle in a position to be able to
23 repay the obligation?

24 A. Well, I don't know if it will be J Sandcastle.
25 It could be changed to somebody else. I mean, J

1 Sandcastle has been removed, you know. I -- they
2 surrendered -- they surrendered the title. It's now in
3 my name. Whether I rewrite the note -- I don't know. I
4 need to get legal advice because now it just seems
5 that -- that the purpose is just so convoluted now,
6 especially with, now, the bankruptcy that came out --
7 that came up. You know, the whole -- the whole reason --
8 now I'm living in it, you know, and my income is changed,
9 I have a job now. So things are just -- the -- the
10 circumstances have changed.

11 Q. But -- but to confirm, J Sandcastle did not
12 repay the note in full, correct?

13 A. No.

14 Q. And there are no agreements currently -- and
15 you're referencing you're going to seek counsel. There
16 are no agreements right now with respect to the note,
17 correct?

18 A. I don't know -- I can't -- I can't speak to the
19 legal ramifications, I mean, because -- just because I --
20 I -- it doesn't make sense to me that it can just
21 disappear. So I don't know what -- I just don't know
22 what the -- the -- the legal ramifications are of that
23 security agreement and the promissory note. I don't
24 know. I -- I have no idea.

25 Q. And I'm not asking you for the legal

1 ramifications.

2 I'm asking, is it correct that there are no
3 agreements that release J Sandcastle from its obligation
4 to repay the note?

5 A. Again, I can't speak to that because they
6 released the title to me. So that would seem like that
7 they -- to me, it would appear that it's -- the debt has
8 been -- or, not the debt, the -- the collateral has been
9 surrendered to the lender. So, I mean, that would make
10 sense to me, so that's why I need to get advice on what
11 to do.

12 You know, it depends on how this whole thing
13 with Houser works out. It might turn out that I move and
14 I use it -- I go back to using it as a rental. I don't
15 know.

16 Q. But -- but again, all I'm asking is, is there
17 any agreement in existence now -- and I'm not asking
18 about legal ramifications or releasing title -- I'm --
19 I'm just asking. Because if there is an agreement, I
20 would like to see a copy of it.

21 A. Right.

22 Q. Is there or is there not an agreement?

23 A. Just the original 11-16 agreements, that's it.
24 That's all that exists.

25 Q. Do you --

1 A. Nothing else has been changed. It hasn't been
2 amended there. Nothing -- no. The answer is no.

3 Q. Let me -- okay.

4 And when you say the original 11-16 agreement,
5 you're referring to the promissory note and security
6 agreements from 2018?

7 A. That's correct.

8 Q. Okay. Thank you.

9 THE REPORTER: And whenever it's convenient, I'd
10 like to take a break.

11 MR. HAYS: Sure. How much break are you
12 thinking about now so we can pick a time to resume?

13 THE REPORTER: Ten minutes is fine.

14 MR. HAYS: I didn't hear you, Nicole.

15 THE REPORTER: Ten minutes is fine.

16 MR. HAYS: Ten minutes is fine. So it's 10:50.
17 We'll resume at about 11:00. Thank you.

18 (A recess was held from 10:51 a.m. until 11:03 a.m.)

19 BY MR. HAYS:

20 Q. Ms. Gallian, you first transferred title to J
21 Sandcastle and then you transferred \$175,000 of funds to
22 J Sandcastle in connection with the execution of the
23 note, correct?

24 A. Okay. So that's a little gray, that statement,
25 so you have to reprint because I think because of the --

1 what I'm hearing you say is that because the dollar
2 amount is the same, you think that they're one and the
3 same transaction. There was two transactions. So I
4 purchased the home, but I loaned \$175,000 to J
5 Sandcastle.

6 Q. What -- what I'm trying to clarify -- and I know
7 they're two different transactions, is two different
8 things went from you to J Sandcastle. One was title to
9 the property, and two was \$175,000 of cash?

10 A. Uh-huh.

11 Q. And J Sandcastle has now transferred title to
12 the property back to you individually, but you said that
13 it made some note -- some payments on the note, you don't
14 recall how many, but that it did not fully repay the
15 \$175,000 back, correct?

16 A. Yes. And if I may clarify that statement?

17 Q. Sure.

18 A. So -- okay. So again, the intent of how it was
19 the -- the -- how it was set up and how it was supposed
20 to flow and work did not happen because there were
21 attorneys' fees that J Sandcastle paid for. So I'm not
22 the best bookkeeper and I have, you know, given
23 everything to a CPA to go through and go, You know what,
24 make sense of this. Okay. What realistically is the
25 bottom line number? What is it?

1 Q. And you said that you currently have somebody
2 looking into that?

3 A. Well, I gave them all the documents, but, you
4 know, that -- they get around to it when they get around
5 to it, but I -- I would like a more -- you know, from a
6 CPA when you just dump off boxes of papers and go, Look,
7 I need spreadsheets or something, you know, with all of
8 the checks that J Sandcastle has paid out, I need to know
9 where -- where the note stands.

10 I don't know. And that's honest -- honest to
11 God, I don't know.

12 Q. So let's leave two blanks in the transcript.
13 One will be for the amount of payments actually made
14 pursuant to the note, and a second will be for the
15 amounts, if any, that you or your CPA believe should be
16 credited against the note for other things such as
17 payment of attorneys fees', for example. Okay?

18 A. Yeah. I mean, that's fair.

19

20

21 Q. Okay. Now which litigation would J Sandcastle
22 have been paying for counsel on?

23 Which case or cases are we talking about?

24 A. Uh-huh. Well, everything is related to the
25 Gables, everything stems from the Gables. So the

1 appellate attorney, Mr. Cassello [phonetic], I believe
2 Ms. Garrels [phonetic], you know, the criminal nonsense.
3 So it -- it just seemed like everything -- everything
4 stemmed --

5 THE REPORTER: I'm sorry. You have to stop when
6 the dog barks. I can't hear both.

7 THE WITNESS: Yeah. It's very busy out there on
8 the street.

9 Okay. So that's why I'm trying to figure out --
10 and again, I'm not a CPA. I'm not any of those things,
11 you know. I don't know if the CPA is going to come back
12 and say none of this stuff -- I don't know -- or all of
13 it. I don't know. So to answer your question -- did I
14 answer it the best I could?

15 BY MR. HAYS:

16 Q. And I'm trying -- I'm trying not to talk when
17 you're talking.

18 The question was, which litigation would J
19 Sandcastle have been paying the attorneys on? And I
20 think your answer is, It's all related to the Gables?

21 A. Well, it is. You're right. Because -- because
22 that -- that's a correct statement because the Housers
23 are related to the Gables, the Gables are related to the
24 Housers, the leases. I mean, all -- there's all sorts of
25 stuff.

1 Q. Well, let's stop for a second. Instead of
2 lumping it into, It's all related to the Gables, can you
3 try to break it down for me, such as, there is one
4 lawsuit where the Gables sued me, and this is what
5 happened to it; and then there's another lawsuit -- can
6 you just try to break it down --

7 A. Sure.

8 Q. -- for me?

9 A. Sure. Okay. Well -- and I think what's in my
10 mind is -- and I wish I knew the date that I did that
11 deposition for Mr. Fellsot [phonetic], but right before
12 that deposition is when I learned that the Gables home
13 was never transferred to Sandra Bradley's trust. That's
14 where I got the assignment was from the Sandra Bradley
15 trust. So what's the ramifications of that? I don't
16 know.

17 You know, how did Houser ever get on the title?
18 I don't know. I just know the date that they got on
19 there. That was in 2010. So --

20 Q. So just go case by case, if you can.

21 A. Well -- but that is -- that is -- it's the
22 Gables case. It's the 913985 case.

23 Q. And is J Sandcastle a party to that case?

24 A. No. They are the -- they are a party to the
25 Houser Bros., which is a party of that case. Well,

1 not -- not -- not on paper, but that's why I -- when I
2 amended my bankruptcy, I'm like, there isn't a cross --
3 you know, there's not a cross-complaint filed yet.

4 Because we've got some real problems with it. It's --

5 Q. So hold on. What do you refer to this case --
6 you mentioned a case number. What do you --

7 A. That's the Gables HOA that started the whole
8 thing.

9 Q. So the Gables HOA case. And what you're saying
10 is that J Sandcastle is currently not a named party as
11 plaintiff, defendant, or otherwise, correct?

12 A. That's correct. Neither are they any of those
13 things on the Houser v. Gallian case.

14 Q. And is there any other pending litigation
15 outside of the Bankruptcy Court?

16 A. Yeah, there is. There is the Gallian v.
17 Huntington Beach Gables, the personal injury, which is
18 going to end up dragging Houser in because they're the
19 property owner -- they claim to be the property owner of
20 that parcel of land over there. So --

21 Q. So there's -- there's three cases. Anything
22 else?

23 A. Let's see Houser v -- or I mean, Gallian v. HOA
24 and Hosso [phonetic], I can't think of anything else
25 besides just the Houser v. Gallian case that, you know,

1 Jeanine Hosso in these adversaries are trying to drag
2 JPad and J Sandcastle in. So that's why I mentioned it.

3 Q. Okay. So three separate cases pending in state
4 court, correct?

5 A. The -- well, the Randy Nickel case.

6 Q. So there's four?

7 A. Randy Nickel -- well, Randy Nickel versus
8 Huntington, then Huntington counter-sued to drag me back
9 into it.

10 Q. So four cases?

11 A. I would think so. Is that four? Yeah.
12 Personal, Nickel, Houser. I can't think of anything
13 else.

14 Q. What's the Nickel lawsuit about?

15 A. I'm not involved in that. I just know that I
16 get the papers and -- the only thing that I can think of
17 is that Jeanine Hosso got herself into a mess and just --
18 because she has a bar number, I believe she made some
19 poor decisions and she got herself and other people sued.
20 And she tried to do things without a court order, and she
21 just thought she was going to bully her way through, and
22 Mr. Nickel is not somebody you can bully.

23 Q. You said Nickel versus Huntington, then
24 Huntington counter-sued to drag you back in.

25 Huntington Gables?

1 A. Yeah. Huntington Beach Gables, yes.

2 Q. Just trying to make the record clear.

3 A. Yeah.

4 Q. And so, you believe it's possible that J
5 Sandcastle funded some of the attorneys' fees in some of
6 these four cases even though it was not a named party,
7 correct?

8 A. Well, because that's where all the money is. I
9 mean, there was only -- you know, as you said in the
10 beginning, you know, there's only \$379,000. Okay. Well,
11 if 185 of it went over to here, you know, what's left?
12 And, well, 175 went over here. Okay. Well, you know, I
13 took money out of my 401(k) because all the money is
14 gone. There is no more,.

15 And so, the problem -- I think -- I think -- let
16 me just -- let me just say this. What's convoluted about
17 all of this is the fact that I've been trying to be very,
18 very frugal in trying to not spend money that I believe
19 didn't belong to me, meaning that I am -- I was J
20 Sandcastle's tenant. Okay.

21 And I was paying rent to J Sandcastle, so, you
22 know, yeah, though I'm the member also, I -- in my mind,
23 they are separate -- separate. And it's -- I paid rent
24 just as if a stranger off the street, like I said, that
25 if I was forced to have to -- to rent this place.

1 That's -- that's why that \$9,000 was there.
2 It's like -- it's not -- it doesn't belong to Jamie
3 Gallian any more. It's rent paid to J Sandcastle because
4 they are the legal owner who's trying to pay the debt of
5 the space. So it just gets so convoluted when you --
6 when -- and I know that you're doing -- we've been very
7 patient with each other; however, it's not simple. It's
8 not a simple answer because it's been almost five years.

9 Q. So let me clarify something you just said. I
10 believe you said you've been paying rent to J Sandcastle;
11 is that correct?

12 A. That's correct. Well, until February 25th.

13 Q. And so, from November of 2018 through February
14 of 2021, you were making monthly payments to J Sandcastle
15 for rent?

16 A. Yeah, or I would make -- give deposits to them
17 so that -- you know, I was the tenant. Okay. They're
18 still entitled to be paid rent for the person who lives
19 in -- in the unit. And that's the way I was trying to
20 treat it is that the -- the rent goes to them and --

21 Q. So -- so on a monthly basis, you would pay rent?

22 A. Yes.

23 Q. And what was the amount of the rent?

24 A. 1,086, exactly what the ground lease -- or what
25 the last ground lease payment or amount was here, that

1 was in the UD action.

2 Q. So from November of 2018 through February of
3 2021, that's a little bit more than two years --

4 A. Correct.

5 Q. -- it's about two years and three or
6 four months?

7 A. Yes.

8 Q. And at just over \$1,000 a month, that's roughly
9 \$25,000, give or take, correct?

10 A. That's -- that's correct. That's correct.

11 Q. So --

12 A. However -- okay. However, circumstances
13 changed, okay, where there were many months that I
14 couldn't pay that because I lost my job. Okay. And my
15 disability was exhausted. Okay. Thank God, you know,
16 COVID relief money came. So yeah, about 20,000 --

17 Q. Is there --

18 A. -- about \$20,000 is -- is about what I believe
19 that I have set aside, specifically, that is due Houser
20 because of the rent that I need to pay that I set aside
21 for J Sandcastle, who should have paid Houser, but that
22 whole thing fell apart, so now I'm paying Houser -- or
23 JPad is paying Houser.

24 Q. Let me -- let me clarify.

25 So on a monthly basis, you would take the money

1 from a Jamie Gallian account and transfer it over to a J
2 Sandcastle account?

3 A. Pretty much. Or -- or if there was a lump sum
4 that I put into that account, meaning, I think, there was
5 one or two when my career ended at United, the 401(k)
6 payments -- so those went to J Sandcastle. So that's why
7 I'm so interested in getting with the CPA to figure out,
8 you know, this money was paid on my behalf for the
9 purpose, because I was their tenant, and that's the way I
10 had always intended to treat it, if that makes sense.

11 Q. But again, whether it was each and every month
12 or periodically, you paid rent by transferring money from
13 your account to a J Sandcastle's account over this period
14 of time?

15 A. Yes.

16 Q. And then the rent stopped in February of 2021
17 after J Sandcastle transferred title back to you?

18 A. Released. Yeah. Released their interest in
19 the -- in the home. Then I never paid out of the J
20 Sandcastle account again.

21 Q. And so, from that point in February of 2021
22 forward, you now considered yourself an owner and not a
23 tenant or renter?

24 A. Yeah, so to speak. Then I -- then it was really
25 my responsibility to keep separate, you know, the rent

1 ongoing from February 21st forward. I think that I got a
2 little confused because, not only is J Sandcastle's name
3 printed on the check, but Jamie Gallian's name was
4 printed on the check. So, you know, it made sense to me
5 that -- wait a minute -- no, no, no, no.

6 It's J Sandcastle's account number on the
7 bottom, so it's not Jamie Gallian's account, and that was
8 my mistake. So I believe May or June is when I just
9 completely stopped making any payments for rent to Houser
10 and used the Alliant account only, or paid cash.

11 Q. Let me -- let me try to clarify what you just
12 said because I'm trying to make sure I understand it when
13 I'm looking at the realtime, but I'm not sure I'm getting
14 it.

15 A. Yeah.

16 Q. So rent payments continued after February
17 because you were confused about accounts or something?

18 A. No, no, no. That's not what I'm saying. What
19 I'm saying is, if you look at J Sandcastle's checks that
20 I paid every single month to Houser and then they sent
21 them back, I needed to make sure that when I filed
22 bankruptcy in July, that there was a clear line, okay,
23 that Jamie Gallian and the Alliant account because they
24 weren't accepting them, I needed to keep a running total,
25 and that was the whole reason why I started at the end of

1 June, I believe it was, trying to get them to do an
2 invoice. So I obtained an invoice from a neighbor here
3 that lives a couple of doors down, and I was just trying
4 to keep a running balance because they refused to send me
5 anything.

6 Q. So -- so two different -- two different things
7 going on here --

8 A. Right.

9 Q. -- and I want to make sure I have them straight.

10 A. Right.

11 Q. One is you were making payments from a Jamie
12 Gallian account to a J Sandcastle account --

13 A. Correct.

14 Q. -- periodically on account of rent over --

15 A. Because I was their --

16 Q. -- this 2 1/2 year period?

17 A. -- tenant, yes. I believed I was their tenant.

18 Q. Please -- please, try to let me finish my
19 question. Let's keep our reporter happy.

20 A. Of course.

21 Q. Second thing that was going on was that, even
22 after February of 2021, J Sandcastle kept tendering
23 payments to Houser Bros. even though it was no longer the
24 registered owner.

25 Is that what you're saying? I'm just trying to

1 understand here.

2 A. Let me try to think for a second.

3 Okay. So February -- because it wasn't until
4 the beginning of March -- no. It was -- let's see.
5 February 25th is when I signed as the member to release
6 title. So I believe March and April and May, or March
7 and April were cash that was dropped off as rent with a
8 receipt. Okay.

9 Q. Okay. And -- and from which account did the
10 cash come?

11 A. It might have come from the EDD Bank of America
12 card because by that COVID happened again and they
13 were -- they were putting money back on my card because
14 that's the only income I had.

15 Q. So you're not sure, but you think it was from
16 your --

17 A. It was either --

18 Q. -- personal account?

19 A. Oh, I know it was the personal account. That's
20 the only -- that's the only income that I had was the
21 COVID money that went into the Allient account, you know,
22 the two payments of, I don't know what was it, 1,400 or
23 \$1,500. So that was the -- because the -- you know, I
24 hadn't worked at United since October, then the COVID
25 money started happening again, but that went on the EDD

1 Bank of America card.

2 Q. Chase account ending in 4589, whose account is
3 that?

4 A. 4589 that -- 45 -- wait a second. I pulled out
5 my statements today. I pulled these thinking you might
6 ask me questions.

7 Q. The easy place to maybe get an answer to this,
8 Ms. Gallian, is --

9 A. It doesn't sound -- it doesn't sound familiar to
10 me. I know that Sandcastle is 7860. 4589, and that's
11 Chase?

12 Q. Yes. And let me finish my statement here.

13 A. Sorry.

14 Q. The exhibits that we sent you --

15 A. Uh-huh.

16 Q. -- include some checks at the beginning of the
17 file. And so, for example --

18 A. Do you have a page number?

19 Q. Yeah. And I'm looking it up. Oh, that's --
20 that's check number 4589, so 7860 is the account number
21 and there's -- it's page 11 of 461, and on the name in
22 the check on the top left corner, it says, J Sandcastle
23 Company LLC, and then underneath it, it says Jamie
24 Gallian.

25 A. That's right.

1 Q. So is account 7860 the J Sandcastle money?

2 A. That's correct.

3 Q. Okay. And so, we will mark and I will write
4 down this page 11 as Exhibit 4.

5 (Exhibit 4 was marked for identification.)

6 BY MR. HAYS:

7 Q. And so, this check is dated in March of 2021,
8 correct?

9 A. Yes, that's right. March --

10 Q. And it says, Pay to the order of, and I'm not
11 sure I'm reading your writing correctly.

12 Can you tell us what that says?

13 A. R-D-R-M-H-E.

14 Q. And what does that sound for?

15 A. Rancho Del Rey.

16 Q. Mobile Home --

17 A. Mobile Home Estates, yes, for space 376.

18 Q. And then, if we flip two more pages to page 13,
19 there is another check --

20 A. Uh-huh.

21 Q. -- from the same account with the same payee
22 dated in April of 2021, correct?

23 A. That's correct.

24 Q. That will be Exhibit 5, which is page 13.

25 (Exhibit 5 was marked for identification.)

1 BY MR. HAYS:

2 Q. And then it looks like on page 15, there's --
3 no, page 14, it is a handwritten note that appears to be
4 from you saying, Please credit to the account.

5 Is this the cash payment you were referring to
6 starting in May of 2021?

7 A. Yeah. And there was another one up -- also, I
8 thought there was another one before that, but maybe I'm
9 mistaken. Oh, no. There was another one. Got it.

10 Q. Just -- just hold on.

11 And so, you signed this note. Is that your
12 handwriting?

13 A. Yes.

14 Q. And that is -- you signed this J Gallian,
15 member. Is that what that reads?

16 A. That's correct. Right.

17 Q. So we will mark this page 14 as Exhibit 6.

18 (Exhibit 6 was marked for identification.)

19 BY MR. HAYS:

20 Q. And if you skip to page 18, there's a letter
21 from J Sandcastle dated June 4th, 2021, that bears the
22 sender of Steven Gallian, and that would show that J
23 Sandcastle tendered \$1,100 in cash in June of 2021,
24 correct?

25 A. Correct.

1 Q. And that will be Exhibit 7 page 18.

2 (Exhibit 7 was marked for identification.)

3 BY MR. HAYS:

4 Q. And then if you'll skip to page 20, there's a
5 typed note with a handwritten signature that appears to
6 be yours, dated July 1st of 2021, where you're signing as
7 the member of J Sandcastle.

8 Is that your signature?

9 A. Yes.

10 Q. So Exhibit 8 will be page 20.

11 (Exhibit 8 was marked for identification.)

12 BY MR. HAYS:

13 Q. So J Sandcastle continued to make the tender of
14 payments to Rancho Del Rey even after the February 2021
15 transfer where they got off of title, correct?

16 A. That's correct. Because it hadn't been
17 processed yet. The title hadn't been processed and that
18 was the whole reason. Because if anybody was to do a
19 title search, it still shows J Sandcastle. So yes,
20 that's correct.

21 Q. Okay.

22 A. And they're the only ones that had any money.

23 Q. So the title hadn't been processed, the transfer
24 wasn't official, if you will. And so, J Sandcastle kept
25 making the --

1 A. But --

2 THE REPORTER: I'm sorry. I didn't hear the
3 question. So J Sandcastle kept making the --

4 BY MR. HAYS:

5 Q. -- payments, correct?

6 THE REPORTER: I couldn't hear an answer.

7 THE WITNESS: Oh, yes. The registration hadn't
8 been processed through Sacramento, correct. I had the --
9 a copy of it, but if anybody was to do a title search, it
10 would still show J Sandcastle, as well as J Sandcastle is
11 the only one that had any money because the COVID rent
12 relief money didn't start until the first quarter of
13 2021.

14 BY MR. HAYS:

15 Q. I believe you testified earlier that, at all
16 times since you acquired your interest in JPad, you have
17 been the 100 percent owner, correct?

18 A. That is eventually what happened. That was not
19 the intent, but that's what eventually happened.

20 Q. In your bankruptcy, you filed, I think, at least
21 ten different sets of schedules, correct?

22 A. Uh-huh.

23 Q. And in some of those schedules, isn't it true
24 that you're listing your ownership interest in JPad to be
25 various different percentages?

1 A. That's correct. As a layperson, yes, that is
2 correct. That -- I was subsequently told by the -- what
3 is that -- Jeffrey Golden recommended that I contact
4 the -- there's, like, these help center whatever's --
5 help -- these attorneys that come in on their lunch hour
6 or something that help and you could ask questions. And
7 they said don't worry about filing amendments. It's --
8 whatever was filed previous to the next amendment is
9 disregarded.

10 Q. My -- my point is, you -- you filed various
11 different sets of schedules with varying different
12 ownership interest in JPad, correct?

13 A. That's correct.

14 Q. And then, on advice of counsel from one of the
15 pro per clinics that the court makes available, you
16 changed your ownership interest in JPad to 100 percent at
17 some point in time, correct?

18 A. That's correct. Because I explained to the
19 attorneys that I hadn't gifted the percentage as I
20 intended to do; I hadn't put it on my tax returns; and
21 the relationship with the boys, as I've testified at
22 numerous 341s, is -- you know, they're kids. You know,
23 yeah, they think it would be great to have an interest in
24 a home, but yet, then when anything legal happens,
25 everybody runs. They have more money than God anyway, so

1 they don't need it.

2 Q. So on your original and first amended schedules,
3 you listed that you were a 1/3 owner in JPad.

4 And who would the other 2/3s interest be owned
5 by?

6 A. My intent was, as you saw in the August 30th,
7 2020, Brian and Steven were the others.

8 Q. And who are Brian and Steven?

9 A. Those are my sons.

10 Q. And are those your only two children?

11 A. I have three, three boys. I have Justin --
12 Justin, he's so much older than the other two that he's
13 off on his own thing.

14 Q. Which explains why it's just Brian and Steven
15 that you were thinking were the other two 1/3 owners,
16 correct?

17 A. Right.

18 Q. And were any documents ever filed with the
19 Secretary of State reflecting Brian or Steven as owners
20 of JPad?

21 A. I believe one of -- I'm trying to think --
22 not -- not L2s, just the 12s.

23 Q. And you said earlier the 12s --

24 A. But they're only managers.

25 Q. -- reflect managers, not owners?

1 A. Right, right, right. And that was only to --
2 just for, you know, as I said, that with -- whether I was
3 going to be available, and I testified at the 341
4 meeting -- you and I talked about this before that --
5 once they found out -- once they said, No, we don't want
6 it -- if you actually look at one of your documents here,
7 if you actually see the one that's got all this White Out
8 over it -- do you know what page that was in here?

9 Q. No, not offhand.

10 A. Okay. So I'll scroll through it because it's
11 very easy to point to -- oh, here it is. If you go to
12 page -- it's the August 20th certificate -- let me see a
13 second, because I just saw it -- it's got a line through
14 it on the certificate of title, and at the 341 meeting, I
15 said, Yeah, it's because at first they wanted to have an
16 interest, and then they changed their minds. So I put
17 Ron, and then they were pissed. So then they wanted the
18 UCC filing done in December.

19 So yeah, it's -- that's the boys. Oh, there it
20 is. It's 346 of 461. It's all White Out because they
21 can't make up their minds.

22 Q. So on page 346 -- and since we're referring to
23 it --

24 A. Yep.

25 Q. -- we'll refer to it as Exhibit 9.

1 A. Yep. And --

2 (Exhibit 9 was marked for identification.)

3 BY MR. HAYS:

4 Q. Hold on. Hold on. You're -- you're -- you put
5 down new legal owners were Brian and Steven as joint
6 tenants with right of survivorship with -- it would be J
7 Sandcastle, correct?

8 A. Correct. The -- the corresponding statement of
9 fact is on page 356.

10 Q. And was page 346 and page 356 submitted to HCD?

11 A. Yes, they were.

12 Q. And page 356 will be listed as Exhibit 10.

13 (Exhibit 10 was marked for identification.)

14 THE WITNESS: With 358, as well.

15 BY MR. HAYS:

16 Q. And 358 will be Exhibit 11.

17 (Exhibit 11 was marked for identification.)

18 BY MR. HAYS:

19 Q. And page 360 also shows that they are
20 lienholders under section 4?

21 A. Let me look at the date here. So I believe --
22 was that -- well, because it's -- it's executed the same
23 day, 8-20, as those other documents. Yep.

24 Q. Okay. So Exhibit 12 will be page 360 out of
25 that folder.

1 (Exhibit 12 was marked for identification.)

2 BY MR. HAYS:

3 Q. On --

4 A. And 354 is what -- is when they all said, Nope,
5 nope, we don't want anything to do with it, and then Ron
6 did it. And that's 354.

7 Q. Was a new certificate of title ever issued by
8 HCD reflecting either Brian or Steven as a registered
9 owner or a legal owner?

10 A. No. They were just on these documents. They
11 were -- they were put on as UCCs, and then Ron was put on
12 for his loan to me, and then eventually taken off
13 July 9th.

14 Q. Okay. So just to be clear, the title itself
15 never reflected Brian or Steven as registered owner or
16 legal owner, correct?

17 A. No, just the UCC.

18 Q. And the documents submitted to HCD that had
19 Brian and Steven's names on it, they were successfully --
20 you managed to successfully keep HCD from issuing the
21 certificates after these documents had been submitted?

22 A. Yeah. I sent them an e-mail, and that's why
23 there's a line through and all that White Out, because I
24 whited it all out and put a line through it, and this --
25 this actual copy is in their file. That's where I

1 thought you got this.

2 Q. And then the -- the -- but the UCCs did get
3 filed with Brian and Steven being listed as secured
4 parties, correct?

5 A. Yeah. Because those are my sons. And again, if
6 I was unavailable, they are my sons, they're my family.
7 Those are the ones that would take over and be able to
8 make legal decisions in my absence.

9 Q. And you were saying earlier that these were
10 gifts, Brian and Steven weren't paying you any money to
11 acquire interest, correct?

12 A. No. These were -- from what I understand --
13 what I was told by CPSSs, you can give 15,000 per year to
14 anybody.

15 Q. I understand. So then in your bankruptcy
16 schedules after saying you were a 1/3 owner of JPad, I
17 think you filed an amended schedule on September 22,
18 2021, saying you were a 1/7 owner of JPad, and who would
19 have been the other six owners?

20 A. Well, by this time, we were full blown COVID,
21 and everybody was helping me if -- they happen to have
22 been Ron -- I think you and I have talked about this and
23 I testified at 341, it would have been Ron, and Bob,
24 Brian, Steven, and Justin, and Emma -- EJ.

25 Q. Who is Emma?

1 A. My granddaughter.

2 Q. And did any of them ever pay you money to become
3 a partial owner of JPad?

4 A. No. This was -- and I -- I -- I gave this --
5 this agreement to Mr. Golden. I gave this -- this --
6 JPad's operating agreement to Mr. Golden with all of --
7 all of these 15, 15, 15, 15, 15, 15 and -- and reducing
8 my ownership. But I did not -- I thought the only way to
9 make it legal is you actually have to put it on your tax
10 return. I don't know if that's true or not true.

11 Again, you know, I was having a rough time with
12 the boys and trying to do what moms -- what parents do,
13 is they -- they leave things to their kids. That's all I
14 wanted.

15 Q. So then you filed next an amended schedule on
16 October 14th of 2021 saying that you had a 70 percent
17 interest in JPad. Who would have been the other
18 30 percent owners?

19 A. Well, by that time -- by this time now,
20 relationships with the kids changed because, you know,
21 this -- all this legal nonsense, especially with Sandy
22 and nobody wanted to have any part of anything, and they
23 didn't want anything, they didn't want any gifts. So now
24 I -- I'm like, Okay, fine. I'll just keep it myself
25 then. And -- but still Ron and Bob were very helpful

1 during the time that I lost my job. And so, I -- I --
2 the only thing that I had left was to repay them by a
3 percentage of JPad.

4 Q. And when you say repay them, how much money had
5 Ron loaned to you?

6 A. He paid for the bond, two bonds, and he was
7 just -- he was the one that -- that I would call when
8 that crazy woman would lie and get me arrested and I was
9 horrified.

10 Q. You said he paid for two bonds. How much was
11 each bond, roughly?

12 A. I think the first one was for 50,000. So I
13 think that was, like, 7 1/2 or 8 percent. And then this
14 second one was 250,000, and I think that was 7 1/2 or 8
15 percent. And the only thing I had -- he didn't want
16 anything. He just, like, No, you know, you'll -- you'll
17 pay me back eventually.

18 I go, No, no, no. It's okay.

19 So I gave him -- gave him an interest in the
20 house until I could pay him back.

21 Q. And when you gave him an interest in the house,
22 you did it by giving him a partial interest in the --

23 A. The encumbrance. No. Well, no, the
24 encumbrance.

25 Q. Let me finish my statement and let's not talk on

1 top of each other.

2 A. Sorry.

3 Q. You -- you were trying to pay him back by giving
4 him the partial ownership interest in JPad which held the
5 legal interest against the house?

6 A. No. I never gave a membership interest in JPad
7 to anybody, only a manager interest. That's it. And a
8 manager interest, that is my ignorance. Okay. I never
9 gave any membership interests. Okay. Whether I misspoke
10 or anything, okay. I gave them an encumbrance on the
11 house. That was it. Okay.

12 Q. Well --

13 A. Because --

14 Q. Hold on.

15 A. Let me --

16 Q. Hold on. Hold on. You're now saying you gave
17 them an encumbrance on the house.

18 What are you referring to?

19 A. I'm sorry. Say that again?

20 Q. You said you gave them an encumbrance on the
21 house. What are you referring to? A UCC1? An ownership
22 interest in JPad? What are you referring to?

23 A. No. At the time, as best as I could recall,
24 again, not having legal advice, okay. Just trying to be
25 thankful that I was out of jail, just trying to just be

1 thankful that I had somebody's help.

2 Q. I'm asking you what I -- what I hope is a very
3 simple question, and that is, you said you wanted to
4 repay them and be fair to them by giving them a lien
5 against the house.

6 A. Right, right.

7 Q. I'm asking -- I'm asking in what manner did you
8 accomplish that?

9 Was it through a UCC1 or was it through
10 something else?

11 A. I think it was just in the statement to
12 encumber. Was it -- you have the document here. Right
13 there. It's an -- I think it was the statement to
14 encumber.

15 Q. So -- so the -- the liens that you're referring
16 to -- to repay Ron and Bob --

17 A. Just --

18 Q. -- was just -- just -- we're starting to talk on
19 top of each other.

20 A. Sorry.

21 Q. The -- the liens -- the liens that you are
22 referring to are liens that are referenced in statements
23 to encumber, correct?

24 A. I believe -- I believe so. It is, I believe --
25 I believe that's what I did. I believe that's what I

1 did.

2 Q. Okay. And when you were filing the various sets
3 of amended bankruptcy schedules listing varying
4 percentage ownership interests in JPad, what were you
5 thinking was the reason that you were not the 100 percent
6 owner of JPad?

7 Was it because of the gifts and the statements
8 to encumber that we're now talking about?

9 A. No. It was -- it was in addition to that.
10 It's -- I didn't have a job. I didn't have any income
11 and I had, you know, Bob that would bring groceries or --
12 or -- and I just felt like I needed to -- just felt like
13 I needed to show -- you know, show my appreciation
14 that -- that he had something for the money. I didn't
15 want it to be considered charity or a gift or whatever;
16 that it would be paid back or that, if I sold the house,
17 that I would pay it back.

18 Q. And I --

19 A. And that was the only purpose.

20 Q. I understand the motivation. I just want to
21 make sure I understand how you implemented that
22 motivation.

23 So when you're filling out the schedules listing
24 varying different percentage ownership interest in JPad,
25 how was it that -- what were you thinking about was the

1 reason you were not the 100 percent owner?

2 So we've covered a couple of things. One is you
3 had signed statements to encumber in giving liens to --

4 A. Just that one person.

5 Q. -- to -- to Ron, right?

6 A. Yeah, for the huge -- yeah.

7 Q. Okay. And so, when you're listing Bob or
8 thinking Bob is an owner of JPad, what is it you're
9 thinking of --

10 A. Just that he's been -- he moved in, originally,
11 to protect me, just to physically protect me because I
12 was scared to be in the house by myself. After -- after
13 March 4th, 2019, I couldn't sleep. And so, I was alone.
14 And so, he came just to have somebody else here because I
15 was afraid to be in the house by myself, and to me, that
16 was value.

17 Q. So -- so in in appreciation of that value, you
18 considered Bob to be a partial owner of JPad?

19 A. I just wanted him to have something where --

20 Q. I -- I understand the motivation --

21 A. Well that --

22 Q. I -- I'm just trying to --

23 (Multiple speakers simultaneously.)

24 THE REPORTER: I don't have it. I just don't.

25 //

1 BY MR. HAYS:

2 Q. You're talking on top of me, Ms. Gallian.

3 I understand why you wanted to do it. I'm
4 asking what, if anything, did you do to implement that?
5 Did you tell him, You're now a partial owner of JPad?

6 A. I think I -- yes. Yes, I did.

7 Q. Did you --

8 A. I -- you have --

9 Q. Did you put anything in writing that got filed
10 with HCD?

11 A. No. It just was in a -- just an agreement. And
12 I -- I believe the -- the JPad agreement, whatever you
13 call it, operating agreement or something, was given to
14 the trustee.

15 Q. So the way you implemented it, you're saying --
16 and I'm just trying to understand, is that in the JPad
17 operating agreement and its minutes and books and
18 records --

19 A. Yes.

20 Q. -- there were notations reflecting that Bob is
21 now a partial owner of JPad?

22 A. Yes.

23 Q. Okay.

24 A. And Ron.

25 Q. And Ron?

1 A. Yes.

2 Q. And --

3 A. And the boys, they were, too. But yet, then
4 they decided they didn't want it, so they did more
5 minutes.

6 Q. So -- so there are initial minutes that say that
7 Brian and Steven are partial owners, and then there are
8 subsequent minutes that say they're no longer partial
9 owners?

10 A. Yes.

11 Q. And for Emma, your granddaughter, same thing?

12 A. That didn't start until 2020.

13 Q. But are there minutes --

14 A. Yeah.

15 Q. -- at JPad reflecting that she is now a partial
16 owner?

17 A. Yes. And then that was changed. But yes.

18 Q. And then she was no longer a partial owner?

19 A. Yeah. Because her dad, my son, Brian, is her
20 father. He didn't want her to have -- none of them
21 wanted to be involved because of all this litigation.
22 They just said no.

23 Q. So then at some point in time, your bankruptcy
24 schedule starts saying that you're the 100 percent owner
25 of JPad.

1 Are there notations on the minutes of JPad books
2 and records reflecting that Ron, Bob, Brian, Steven,
3 Justin, and Emma are no longer owners?

4 A. No. I think the last schedule just showed --
5 I'm trying to think of what the last schedule shows. I
6 don't know if that's what you call it. I think we called
7 it a schedule, like, a C or D or something like that. I
8 don't think there was any -- any amendments after that
9 because everybody just was -- just -- it just wasn't fun
10 anymore. It just wasn't -- just wasn't --

11 Q. So --

12 A. -- what I intended. It's kind of like, you
13 know, I almost think sometimes that I used it as a --
14 what do you call that -- not a will -- or something
15 probably like a will, you know, you want to leave your
16 things to your children. It just -- just wasn't working
17 anymore. Just too convoluted.

18 Q. So the last set of JPad books and records
19 reflect whom as the owners?

20 A. I think the seven people is what I think. I
21 think it -- it had -- I think that it had notations where
22 for three years there was 15, 15, 15 for all three boys,
23 and then Emma came -- came along, and I think she got 15,
24 and then I don't remember what the amounts were listed
25 for Ron and Bob.

1 Q. So the JPad books and records still reflect
2 seven owners, correct?

3 A. That's seven -- four, five, six -- well, if you
4 count me, I would be the seventh.

5 Q. Yeah. Exactly. Okay.

6 A. But now it's --

7 Q. How much --

8 A. I.

9 Q. -- it -- you were talking about Ron loaned you
10 money for the bonds, and you were saying 7 1/2 to 8
11 percent of 50 grand, and 7 1/2 or 8 percent of 200 grand.

12 Was that the extent of the money he loaned you?

13 A. No -- oh, you mean the bond amount. What the --
14 what the bond company charges. They were caught
15 charging -- I think it was 7 percent of 50,000, so
16 whatever that is.

17 Q. I understand. It's --

18 A. Yeah.

19 Q. -- 3,500, yeah, your testimony had been 7 1/2 or
20 8 percent --

21 A. Yeah.

22 Q. -- of the bond amount was the premium they
23 charged you --

24 A. Right.

25 Q. -- to issue the bond.

1 A. Right.

2 Q. So if you take the 7 1/2 or 8 percent of 50
3 grand or the 7 1/2 or 8 percent of 200 grand --

4 A. Right.

5 Q. -- that's the amount of -- that's the amount of
6 money that Ron loaned you.

7 Were there other monies that Ron loaned you?

8 A. Just -- he said it wasn't a loan, but he paid an
9 attorney, his first name is John -- John -- oh, God,
10 what's his first name -- Newport Beach on Birch Street,
11 John Graber maybe? He paid his bill.

12 Q. And when was that?

13 A. I believe January of 2020. It was a Sunday, and
14 he -- he got cashier's checks and paid them.

15 Q. And that's 2020, not 2021?

16 A. Right.

17 Q. Okay. And then was there ever any written
18 documents where you said to Ron, I promise to repay you X
19 amount of money?

20 A. The -- just the encumbrance. Just -- just the
21 statement to encumber, and I said, No, I don't want this
22 hanging over my head. You'll get your money back.

23 Q. Okay. Now with respect to Bob, did you -- did
24 he ever loan you money or pay for things for you in
25 exchange for you putting him down as an owner of JPad?

1 A. He never asked and he never -- I just -- I was
2 just so grateful that I came up with an amount and I
3 said, I'm going to pay you back.

4 Q. But he never said, This is a loan, correct?

5 A. No, No.

6 Q. Okay.

7 A. And I did not consider any of these gifts.
8 These were just -- these were things that -- anyway.

9 Q. Okay. You and/or J Sandcastle applied to be
10 tenants in the park, correct?

11 A. J Sandcastle originally applied by itself, and
12 because the park was adamant about not issuing any lease
13 agreements with a business, then subsequently I applied a
14 couple times. I had a co-signer, Ron, apply with me, and
15 when Ron and I were having problems, then Bob -- then I
16 applied again, but then Bob applied with me for the
17 income qualification.

18 Q. And these applications are being made over what
19 period of time, November 2018 through?

20 A. All the way through 2021.

21 Q. And --

22 A. No. Wait a minute. All the way through -- I
23 believe it was September of 2020 was the last one.

24 Q. So the very first one you said was submitted by
25 J Sandcastle, correct?

1 A. Solely, yeah.

2 Q. And was that one approved or disapproved?

3 A. Neither. They didn't -- they didn't even
4 acknowledge J Sandcastle. They just chose me, and
5 they -- everything came in my name.

6 Q. But -- but the response to the application to
7 become tenants was the application was denied, correct?

8 A. That -- yeah, yeah. Yes. The application --

9 Q. Okay.

10 A. The application was denied without acknowledging
11 that J Sandcastle was the submitter, yes.

12 Q. Okay. And I know that you take issue that the
13 denial was not proper, correct?

14 A. No, it wasn't. They -- they --

15 Q. Okay. I'm just --

16 A. -- ran my name without permission.

17 Q. And then when did you get notice that the
18 application was denied?

19 A. Sometime toward the end of November --

20 Q. Of --

21 A. -- the Pinon Drive address.

22 Q. And that was in 2018, correct?

23 A. Yes.

24 Q. And so, when you moved onto the property, you
25 had not yet been approved to be a tenant, correct?

1 A. That's true.

2 Q. When you were disapproved, why did you continue
3 to remain on the property as opposed to moving?

4 A. Because I was the purchaser under, you know, I
5 was under the color of being a bona fide purchaser.

6 Q. Why did you not just sell the property if you
7 weren't accepted as a tenant and --

8 A. I tried.

9 Q. -- in this thing -- and so, what efforts did you
10 make to sell it?

11 A. I did. I did many times. Well, at first, I was
12 lied to. I was lied to by the attorneys for Houser.
13 They told me I had to move the house. So, foolishly, I
14 called contractors -- local contractors here in
15 Huntington Beach. One of them was Coast, and they
16 thought I was nuts. They're going, You want to what?

17 I said, I bought this -- this home, and they're
18 saying that I have to move it.

19 And they go, Who told you that?

20 And I told them the company. Well, they gave me
21 a phone number to call, which was a person by the name of
22 Richard Hair [phonetic] at Star.

23 I called Star and I told them what I was told.
24 He goes, That's impossible. He goes, Are you in the
25 Ryan home?

1 And I said, Yes.

2 He goes, I built that home. He goes, I have --
3 I am the one that probably puts 90 -- well, he is the
4 one -- 90 -- or, maybe it was a greater percentage. He
5 said, I don't build homes in there to move. If you try
6 to move that home, it would be uninhabitable, were his
7 exact words. He then asked me, Who denied your tenancy?

8 And I told him. And he called the office and
9 spoke to whoever. I don't know who he spoke to. I
10 wasn't privy to the conversation. So he tried to work
11 out something with the park, and they were just adamant
12 that they wanted this house moved.

13 And he goes, They can't force you to move the
14 house. He goes, That's ridiculous.

15 And then that was the end of that.

16 Q. What efforts did you make to sell the house?

17 A. I listed the house. However, I had two or three
18 people -- and even to this day when anybody contacts me,
19 I don't waste their time. I immediately refer them to
20 the park because the park is going to either give them an
21 application to complete or just discourage them somehow.

22 Well, it was more of the latter because a couple
23 of brokers that I had asked to represent me contacted the
24 park, and Chris Houser wrote a letter to one of the
25 brokers and said, The house cannot not be sold in place.

1 So it's -- again, nobody wants to get involved
2 when it's messy. So I've been trying to sell it on my
3 own as just an in-place house; however, with the prices
4 of homes now and the rents and not going back to United
5 yet, and, you know, just various reasons, I -- when I was
6 participating in the mediation, one of the solutions was
7 for Houser to purchase an equal home in another park, and
8 the mediator thought that was a great idea. He goes,
9 I -- I don't think I see anything wrong with that. He
10 goes, They don't want you to live there. He goes, So
11 that's a great solution. However, they wouldn't do it.
12 They -- they just wanted to give me money, and I said,
13 No, I don't need money. I need a home. So that fell
14 out -- that fell apart.

15 So then -- and the second solution was put the
16 registration in Jamie Gallian's name and maybe they'll
17 reconsider and issue a lease and this all nonsense will
18 be over. And that didn't happen. So those are the
19 efforts. Even Judge Bower told them -- he goes, If --
20 told the attorney, he goes, If I find out, if you have --
21 I don't remember his exact words, but I have the
22 transcript. He goes, If you denied, you know,
23 wrongfully, a potential tenants, we're going to have a
24 problem. So -- and then he retired.

25 Q. So are you saying that your present feeling and

1 intention is that you would be willing to have the
2 property sold if you could get cooperation, if you will,
3 from Houser Bros. to allow someone to purchase and get a
4 tenancy?

5 A. Yeah. In fact, it was about -- I have the phone
6 number, and you can call him and confirm it, but, in
7 fact, I sent -- a couple months ago, I sent them a
8 potential buyer and -- I think people nowadays want to
9 see if they qualify for a tenancy in a park. They
10 wouldn't even talk to them. They wouldn't even consider
11 letting them fill out an application. It had to be --
12 the purchase had to have been already in place, you know,
13 like, beginning.

14 And a lot of people just want to see -- they
15 don't want to go through all that. They want to see if
16 they're even going to qualify as tenants. They wouldn't
17 even speak to them.

18 Q. Yeah. But again, my question was, you would be
19 willing to participate in a sale if the Houser Bros.
20 would consider potential buyers?

21 A. Well, it's not as simple as all that, but
22 that's -- that's -- that has always been the goal.

23 Q. How many different UCCs were recorded against
24 the house -- the manufactured home from and after
25 November 1st of 2018?

1 A. Well, there's been several depending on who
2 filed them. I know that I have no problem writing Jamie
3 Gallian at the top. A lot of people want to file it, but
4 they don't want to put anything at the top.

5 Then Bob and Ron got started doing it, and in
6 November -- I think it was around September -- maybe it
7 was September, August or September of 2021, they started
8 filing stuff because now they're -- they believed that I
9 was being -- I think -- I think everybody's interest was
10 just unclear. I think everybody was panicking and the
11 only thing -- the only UCCs that I filed was the initial
12 three or four, the one on August -- or was it December,
13 it might have been December -- with Brian, Steven, and I
14 filed the two because Jeanine Hosso filed UCCs that I
15 didn't approve or I didn't agree to. So then I filed
16 UCC5s that said, No, she doesn't have a claim to my home.
17 I filed those.

18 And then I think I filed -- I know I filed the
19 last two that said -- making the correction that I was
20 never a debtor to begin with, and that was filed in
21 error, the ones in 2019.

22 Q. I --

23 A. If you're looking for a number, I have no idea.

24 Q. On the day you filed bankruptcy, what was the
25 state of UCC filings?

1 A. Are you looking for a number?
2 Q. No.
3 A. Or which ones were -- were --
4 Q. Just what --
5 A. The -- the --
6 Q. Hold --
7 A. -- the only legal ones are the -- the one I
8 think it ends in 27 -- or, not legal. That's not the
9 right word. But 27 is the -- is one at the beginning on
10 1-14. The one in December --
11 Q. 1-14 of what year?
12 A. '19.
13 Q. And then the one in December of '19?
14 A. The one in December, I believe it was
15 December 2020. What was after that?
16 Q. So my question is, on the day you filed
17 bankruptcy, if somebody did a UCC search, what would they
18 have found in terms of who were the lienholders of
19 record?
20 A. The one from 2019, I believe. Actually --
21 Q. What --
22 A. -- there were three -- there were three, 2019
23 and the 8 -- the 2020 --
24 Q. You're saying --
25 A. The --

1 Q. -- you're saying there would be three, but I've
2 got January 14th of 2019 and December 2020.

3 What's the third one?

4 A. Well, there were three on January 14th, 2019.
5 There's the one that ends in 74.

6 Q. And then there's the one in December of 2020 --

7 A. Right.

8 Q. -- so that would be four liens --

9 A. That's the fourth.

10 Q. Hold on. Don't -- don't talk on top of me --

11 A. Sorry -- sorry.

12 Q. -- please.

13 There would be four liens of record that had not
14 been terminated as of the day of bankruptcy, correct?

15 A. Well, isn't a -- isn't an AD-1 -- isn't that a
16 replacement for an error?

17 Q. I -- I don't know the forms by form number the
18 way you're referring to them.

19 A. Okay.

20 Q. I just want to know, like, what would the title
21 have shown as far as liens --

22 A. Right.

23 Q. -- by running a UCC search.

24 There were four separate things that were
25 outstanding at that time?

1 A. I believe, yes. There was three on the 19th of
2 20 -- 2019 and one for 2020.

3 Q. And what do those four UCCls show as far as who
4 were the secured lienholders?

5 A. Jamie Gallian, JPad, Brian and Steven Gallian.

6 Q. Jamie, JPad, Brian and Steven, and you said the
7 one that reflected you as a secured creditor was
8 incorrect?

9 A. No. That was the one that reflected me as a
10 debtor.

11 Q. That was incorrect.

12 A. That was incorrect. And I thought -- I wasn't
13 sure, but I believed -- at the time when I was trying to
14 figure out how to correct it, I believed that the AD-1
15 corrected it, but it never got corrected. So that's why
16 I -- I made sure that I did a 5, a UC-5, I thought was
17 the amendments that you record when you want to change
18 something to make it clear.

19 Q. What was the thought for why you personally were
20 a secured creditor against the home?

21 A. I believe that -- do you have a timeframe?

22 Q. Well, you're -- you're saying that one of these
23 four filings reflected you as a secured creditor --

24 A. Oh.

25 Q. -- as an individual name, correct?

1 A. January -- January 14th, 2019, I was the secured
2 party, and I assigned it to JPad.

3 Q. Okay. So that's one and the same lien?

4 A. Yeah. That's the same document.

5 Q. Okay. So as of the petition date, the three
6 lienholders would be JPad as assignee of you
7 individually, plus Brian, plus Steven?

8 A. Correct.

9 Q. Okay.

10 A. Yeah. I don't believe Ron was ever added to a
11 UCC. I could be mistaken, I'm not sure, but I don't
12 remember any. I just remember he was on the statement to
13 encumber.

14 Q. And the amounts or percentages that Brian and
15 Steven were due under these UCCs will be reflected in the
16 minutes of JPad?

17 A. Yeah. The 15,000 for three years.

18 Q. For each of them?

19 A. Yeah. For those two and Justin, but Justin was
20 never added to a UCC. He was just added in the -- in the
21 document, in the minutes.

22 Q. Yeah, but as far as Brian and Steven, according
23 to the JPad minutes, it would be \$45,000 each?

24 A. Yeah. And Justin would be 45, as well, and Emma
25 would only be 15.

1 Q. But -- but I'm -- I'm talking about -- let me
2 finish my sentence.

3 I'm talking about what was the amount secured by
4 the actual UCC1 filing. For Brian, it would be --

5 A. The --

6 Q. -- wait.

7 For Brian, it would be 45,000, and for Steven,
8 it would be 45,000, correct?

9 A. Yeah. But that doesn't say that on there.
10 That's just what you're assuming, but --

11 Q. I'm not assuming. I'm -- I'm repeating your
12 testimony that it was 15,000 a year for three years, so
13 they would have been owed 45,000 each --

14 A. Correct.

15 Q. And then the UCC filing -- let me finish,
16 please.

17 The UCC filing would be evidence of their lien,
18 which secures the \$45,000 claims, correct?

19 A. Yes.

20 Q. Okay. Thank you.

21 THE REPORTER: Counsel, if we can take a break
22 whenever it's convenient.

23 MR. HAYS: If people can hang on -- oh,
24 actually, let's just do a ten-minute break and then I
25 think I'm probably 15 minutes or less from being done as

1 opposed to taking a one-hour lunch break, if that works
2 for people.

3 THE WITNESS: Yeah. That's fine. I'm okay.

4 MR. HAYS: Nicole, does that work for you?

5 THE REPORTER: Ten minutes is fine, and then we
6 can come back and finish it up.

7 MR. HAYS: Okay. Great. Thank you.

8 (A recess was held from 12:17 p.m. until 12:34 p.m.)

9 BY MR. HAYS: Okay. I do not have any further questions.
10 And so, we just need to do a little bit of housekeeping
11 here. The court reporter will type up an official
12 transcript. What you're seeing in realtime is not the
13 official transcript. And then she will e-mail it to you,
14 if you could provide her with the e-mail address you
15 would like her to use. You want to just do that right
16 now?

17 A. Well --

18 Q. Or we can --

19 A. I don't want -- yeah. I don't want to mess up
20 the screen because I might not get you back.

21 Q. So is 30 days enough time for you to read the
22 transcript and make sure it accurately -- you believe the
23 reporter accurately transcribed your testimony?

24 A. Yes.

25 Q. And then you will have an opportunity to make

1 any changes and then sign and return that within the
2 30 days. But just be aware that if I asked you a yes/no
3 question and you said yes today but then you changed that
4 to no, that that could be used to impeach your
5 credibility because you've now completely flipped your
6 answer, for example.

7 A. Okay.

8 Q. So just -- just be aware as you're making the
9 changes that, you know, you want it to be accurate for
10 what you said here today. I would also ask that -- you
11 mentioned the minutes of JPad --

12 A. Uh-huh.

13 Q. -- that you said you sent to the trustee. We
14 got a lot of stuff from the trustee, but I don't believe
15 we got all of those minutes. Can I get your agreement on
16 the record to just --

17 A. Yeah.

18 Q. -- e-mail that to Brad Lay Lanais?

19 A. Do you just the minutes or do you want the whole
20 book?

21 Q. The book will be fine, if you have it, just to
22 make sure that the --

23 A. Just -- it's just a bunch of stuff.

24 Q. Okay. Just go ahead and send it.

25 A. All right. I'll send to you what I can find.

1 Q. Okay. And then the court reporter traditionally
2 has a duty under the law to maintain custody of the
3 original transcript.

4 And Nicole, you said that's your preference for
5 how to handle things? She's nodding yes.

6 So do I have your agreement, Ms. Gallian, that
7 she will retain the original and that you and I can
8 purchase copies of that?

9 A. Sure. That's fine.

10 Q. Okay. I think that covers everything. And so,
11 unless anybody else has anything to say, I think we can
12 go off the record and we will be done with the
13 deposition.

14 But before you disconnect, Ms. Gallian, the
15 reporter does have some questions with regard to
16 spellings, and she will need the e-mail address from you.

17 A. Okay.

18 Q. Okay. So we're off the record now.

19 (Whereupon proceedings concluded at 12:37 p.m.)
20
21
22
23
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25

JAMIE GILLIAN, Date

REPORTER'S CERTIFICATE

I, NICOLE HATLER, a Shorthand Reporter, State of California, do hereby certify:

That JAMIE GILLIAN, in the foregoing deposition named, was present and by me sworn as a witness in the above-entitled action at the time and place therein specified;

That said deposition was taken before me at said time and place, and was taken down in shorthand by me, a Certified Shorthand Reporter of the State of California, and was thereafter transcribed into typewriting, and that the foregoing transcript constitutes a full, true and correct report of said deposition and of the proceedings that took place;

IN WITNESS WHEREOF, I have hereunder subscribed my hand this 19th day of July 2022.



NICOLE HATLER, CSR NO. 13730
State of California

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1 UNITED STATES BANKRUPTCY COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3 --oOo--
4 In Re:) Case No. 8:21-bk-11710-ES
5 JAMIE LYNN GALLIAN,)
6 Debtor.) Chapter 7
7) Santa Ana, California
8) Thursday, July 21, 2022
9 10:30 a.m.
10 CONT'D HEARING RE: CREDITOR
11 HOUSER BROS. CO. DBA RANCHO
12 DEL REY MOBILE HOME ESTATES
13 MOTION OBJECTING TO DEBTOR'S
14 CLAIMED HOMESTEAD EXEMPTION
15
16 TRANSCRIPT OF PROCEEDINGS
17 BEFORE THE HONORABLE ERITHE SMITH
18 UNITED STATES BANKRUPTCY JUDGE
19
20 APPEARANCES:
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24 Huntington Beach, California
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Proceedings recorded by electronic sound recording;
transcript produced by transcription service.

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ii

1 APPEARANCES: (Cont'd.)

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1

1 SANTA ANA, CALIFORNIA THURSDAY, JULY 21, 2022 10:30 A.M.

2 --oOo--

3 THE COURT: Moving on to number 32 on today's
4 calendar, In the Matter of Jamie Lynn Gallian. I'll take
5 the appearance of the moving party.

6 MR. HAYS (via Zoom): Good morning, your Honor.
7 For the moving party, this is Ed Hays of Marshack Hayes.

8 THE COURT: All right. And the debtor?

9 Ms. Gallian?

10 I see that she's on.

11 Ms. Gallian, I'm not sure if you can hear me.

12 MS. GALLIAN (via Zoom): Yes. Yes, your Honor.
13 Can you hear me?

14 THE COURT: Yes, I can hear you now. Go ahead.

15 MS. GALLIAN: Okay. Jamie Gallian, debtor.

16 THE COURT: All right. And Ms. Jasso?

17 MS. JASSO (via Zoom): Janine Jasso, observing.

18 THE COURT: All right. Thank you. I apologize
19 for the mispronunciation.

20 Anyone else appearing?

21 MR. DE LEEST (via Zoom): Yes, your Honor. Aaron
22 de Leest, Danning, Gill, Israel and Krasnoff, for the
23 trustee. The trustee I believe is also online.

24 MR. GOLDEN (via Zoom): Yes, your Honor. Jeff
25 Golden, trustee. Good morning.

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2

1 THE COURT: All right. Thank you. Anyone else?

2 MR. GOE (via Zoom): Yes. Rob Goe for the
3 Huntington Beach Gable HOA. We're just joining in and I
4 won't be arguing.

5 THE COURT: All right. Thank you. So the --

6 MS. GALLIAN: Your Honor, may I just --

7 THE COURT: Hold on. Since today's ruling is in
8 favor the moving party, Ms. Gallian will be allowed to
9 address the Court first.

10 Go ahead, Ms. Gallian.

11 MS. GALLIAN: I just want to make sure that you
12 can see me.

13 THE COURT: I cannot. Oh, now I can.

14 MS. GALLIAN: Okay. Great.

15 THE COURT: I can see you now.

16 MS. GALLIAN: All right. Your Honor, I just
17 dropped in the dropbox a proof of a real-time screen capture
18 from the Orange County Tax Assessor's Office indicating the
19 effective date taken from HCD's certificate of title. The
20 effective date of the exemption was 2/25/21 and I was
21 wondering if -- and I have sent it to all counsel -- Mr.
22 Golden's counsel, Mr. Hays, Mr. Goe. And I beg the Court to
23 please consider the document on its face.

24 THE COURT: Mr. Hays?

25 MR. HAYS: Your Honor, this is new evidence that

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1 was not provided prior to the hearing. It was something
2 that Ms. Gallian emailed after your Honor took the bench
3 this morning but before getting to this matter. It wasn't
4 attached to the debtor's opposition, and there is no
5 foundation for the authenticity of this document.

6 And this document does seem to be at odds with
7 what Ms. Gallian's own evidence says attached to the
8 opposition and what's on the Orange County Tax Assessor's
9 website, which I've run a search on since receiving Ms.
10 Gallian's email.

11 We would object to consideration of this late
12 filed purported evidence as having no foundation or
13 authenticity and not something that was timely provided.
14 And the Court was very specific in its last order continuing
15 this matter that no further pleadings would be considered,
16 or evidence, and so we would object.

17 And even if this was a valid and genuine and
18 authentic document, which we have no indication that it is,
19 it only goes to the issue of burden of proof. And for the
20 reasons set forth in the tentative, we still think that the
21 debtor has failed to -- or we would have carried our burden
22 of proof even if the Court says the burden of proof is on
23 us.

24 MS. GALLIAN: I would just respectfully disagree
25 with Mr. Hays. Referring to the 522(f) motion that is

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1 currently pending, if the Court would pull up part two, page
2 seven and eight. It is a copy of the homestead -- or the
3 home exemption application for the tax assessor's office.

4 And I have been informed, and it says right at the bottom of
5 it, "This is not a public document." It is not available.

6 I, your Honor, have spent two months. I was
7 crying hysterically with the assessor's office, trying to
8 get something for your Honor. This is not readily available
9 to the public. I said -- I have been -- they know me by
10 name there now.

11 THE COURT: Well, let me just say this.

12 MS. GALLIAN: Yes, ma'am.

13 THE COURT: You should have realized by now, this
14 is not how we operate. Hold on. If the trustee -- if the
15 situation was reversed and the trustee said, "We just filed
16 something this morning that we believe supports our motion,"
17 I would not consider it. And there's a reason for it, and
18 it's called due process.

19 MS. GALLIAN: Yes, ma'am.

20 THE COURT: I'm not going to look at it either
21 because everyone is supposed to be on a fair playing field,
22 on an equal playing field.

23 The only reason, by the way, that we're having
24 this hearing at all --

25 MS. GALLIAN: Yes, ma'am.

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1 THE COURT: -- is because you had filed your
2 opposition one day before the hearing. And I was very clear
3 on that. There are rules that need to be followed.

4 But I gave you some leeway on that and I continued
5 the hearing to today --

6 MS. GALLIAN: Yes, ma'am.

7 THE COURT: -- so that a proper reply could be
8 filed as provided under the local rules.

9 So it's not fair to the other side to file
10 something on the day of the hearing and expect to have it
11 reviewed by the Court. And I'm not going to continue this
12 hearing.

13 If you think you've got sufficient evidence to
14 justify a motion for reconsideration under Federal Rule of
15 Civil Procedure 59 or 60(b), you can do that. But I'm not
16 going to continue this hearing again because it is
17 perpetuating, oh, you can process something at the last
18 minute and the Court will just continue it. And that's not
19 fair to the parties who have appeared today.

20 MS. GALLIAN: And, respectfully, I hear your Honor
21 very well. However, I would add that in closer -- in
22 closely looking at the movant's document that he claims to
23 have gotten from the tax assessor's office, in very, very
24 fine print on the left it says that the taxes were already
25 paid and it -- and it -- I'm so nervous right now. But it

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1 clearly says right on the left-hand side. When he just says
2 that he searched the tax assessor's office, it's there right
3 down in real-time.

4 So I'm not an attorney. I've done the best I can.
5 So if a motion for reconsideration or appeal is my next
6 step, then I respect your Honor in allowing me to make the
7 record as I have today.

8 THE COURT: Thank you.

9 The tentative ruling will stand.

10 And, Mr. Hays, if you would submit an order. And
11 you can attach my tentative ruling. I'm not going to read
12 it into the record except to incorporate it by reference,
13 and it should be attached as an exhibit to the order. That
14 will be sufficient.

15 MS. GALLIAN: Thank you, your Honor.

16 MR. HAYS: Your Honor, if I may just inquire.
17 Given that the documents that Ms. Gallian is discussing,
18 which still at this moment have not been filed with the
19 Court as part of these proceedings, if the Court were to
20 consider it and accept it, it only goes to the burden of
21 proof. And would your Honor be in a position based on the
22 very detailed tentative to say that even if the burden of
23 proof was on my client --

24 THE COURT: No, I can't do that unless I review
25 the document. And I don't have time during this hearing. I

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1 still have another calendar to prepare for.

2 MR. HAYS: I understand, your Honor.

3 THE COURT: I don't have time to look at that
4 document and I'm not going to make a statement when I
5 haven't reviewed the document.

6 MR. HAYS: I understand, your Honor. The document
7 just says an exemption is or has not been filed, and that's
8 all it would say. And so -- but I understand your Honor's
9 comment that you're not in a position to make that ruling
10 and determination today and we will lodge the proposed
11 order.

12 THE COURT: Okay.

13 MR. HAYS: Thank you.

14 THE COURT: Very well. Thank you.

15 MS. GALLIAN: Thank you, your Honor.

16 MR. DE LEEST: Thank you, your Honor.

17 MR. GOLDEN: Thank you, your Honor.

18 (Proceedings concluded.)
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1 I certify that the foregoing is a correct
2 transcript from the electronic sound recording of the
3 proceedings in the above-entitled matter.

4
5 /s/Dee Gregory 8/21/22
6 Transcriber Date

7 FEDERALLY CERTIFIED TRANSCRIPT AUTHENTICATED BY:

8
9 /s/L.L. Francisco
10 L.L. Francisco, President
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